

STATE OF ILLINOIS)
)
COUNTY OF COOK)

AFFIDAVIT

I, Brooklynn A. Riordan, Special Agent of the Federal Bureau of Investigation, United States Department of Justice, having been duly sworn under oath, states as follows:

I. INTRODUCTION

1. I am a Special Agent (“SA”) with the United States Department of Justice, Federal Bureau of Investigation (“FBI”) and have been so employed for 10 months. I have received specialized training in corruption matters and narcotics and dangerous drug investigations while employed as a Special Agent. I am familiar with and have participated in all of the normal methods of investigations, including but not limited to visual surveillance, and use of search warrants, informant and cooperating witness debriefings, pen registers, document analysis, and the utilization of undercover agents/officers. I have been personally involved in investigations of controlled substances-related offenses involving the possession, sale, and distribution of cocaine, heroin, and crack cocaine in the Chicago and metropolitan area, and investigations involving distribution of these substances by members of Chicago area street gangs.

2. I am currently assigned to the Criminal Enterprise Squad, which investigates street gangs in and around the City of Chicago. Prior to becoming a Special Agent with the FBI, I was a Forensic Scientist for six years with the Ohio Bureau of Criminal Identification and Investigation. I have monitored and been involved in Title III interceptions. I have witnessed the debriefing of informants, have been present to monitor undercover drug buys, and have participated in surveillance. The information in this Affidavit is drawn from information obtained from consensual recordings; physical surveillance; information received from other law enforcement agents; my

experience and training; and the experience of other agents. As part of my current assignment, I have investigated criminal violations of the Controlled Substance Act as found in Title 21 of the United States Code, as well as related violations found in Title 18 of the United States Code. Based on my training and experience, I am familiar with the ways in which individuals conduct their drug-related business, including, but not limited to their: (a) methods of distributing narcotics; (b) use of telephone communication devices; and (c) use of code words to identify themselves and the nature of the communication, and to conduct their drug-related transactions.

3. The information contained in this Affidavit is based on my conversations with and review of reports prepared by agents in the FBI, as well as other law enforcement agents and officers; the results of physical surveillance; information provided by cooperating witnesses and a cooperating informant; law enforcement's interviews of witnesses; law enforcement's review of recordings of consensually recorded conversations and conversations intercepted pursuant to Court orders authorizing the interception of wire communications. Since this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

4. This Affidavit is made for the purpose of establishing probable cause in support of a Criminal Complaint charging:

- a. TERRELL COVENS, also known as ("aka") "RELL," aka "RELLO";
- b. RONALD TURNER, aka "BOO," aka "EARL," aka "BOO EARL";
- c. TREVEL COVENS, aka "MOOK," aka "MDOT";
- d. LAVELL COVENS, aka "BAY BAY," aka "STYLES";
- e. KELVIN JACKSON, aka "CAMEO," aka "OSKI";
- f. RANDALL BREWSTER, aka "RANDY";
- g. KENDALL BREWSTER, aka "KEN KEN";
- h. MARCELL BREWSTER;
- i. TERRANCE BREWSTER, aka "TERRY";
- j. LAPRIEST GARY, aka "PREECY";

k. WAYNE BROWN, aka "QUACK";
 l. KENNETH MARSHALL, aka "SUGAR RAY";
 m. EARNEST BROWN, aka "D," aka "DION," aka "DENON";
 n. ADONIS HOUSE, aka "DON";
 o. MARCUS BROWN, aka "BIG G";
 p. JESSICA BROWN;
 q. JASON RATLIFF, aka "JAY";
 r. JON RATLIFF;
 s. QUENTIN REED, aka "SWINDLE";
 t. LEVELL HICKS, aka "VJ," aka "VELL";
 u. KENYATI JORDAN, aka "TB", aka "TONE", aka "SQUIRE";
 v. KENNETH STARKS, aka "SHAQ";
 w. JOHNEAK JOHNSON, aka "PEPE," aka "PAY PAY";
 x. ALMONETTA HEMPHILL;
 y. CALVIN MCWRIGHT, aka "BULO", aka "ACE";
 z. LAMONT HARRIS, aka "FRO FRO";
 aa. TION NEWTON, aka "T-MAC"; aka "MAC," aka "TIM";
 bb. RITA HEMPHILL;
 cc. SHALONDA BROWN, aka "PUMPKIN," aka "BIG P";
 dd. QUANTA WRIGHT, aka "RIO," aka "MARIO";
 ee. ELGIN CURB, aka "SHIESTY";
 ff. LOUIS EUBANKS;
 gg. SAMUEL HARRIS, aka "SNEED," aka "SAM";
 hh. SHAUN JAMES, aka "BRISCO";
 ii. SHANTA JAMES;
 jj. FREDERICK YOUNG, aka "FREDDIE MO," aka "FRED MO," aka "MO";
 kk. PRENTICE EARL, aka "BODIE," aka "DIRTY SOUTH";
 ll. JERMAINE HARRIS;
 mm. DAVID HARRIS, aka "LIL' DAVE";
 nn. DONRIE ROBINSON, aka "BLACK";
 oo. RODNEY WILLETT, aka "PORK CHOP";
 pp. KENNETH SYKES, aka "KENNY LORD";
 qq. HERBERT ROBINSON, aka "POOKIE," aka "HERB";
 rr. IVAN WHITE, aka "STUDDER";
 ss. JACQUELINE HOLMAN, aka "JACKIE";
 tt. SALVATORE BASS, aka "KOJACK";
 uu. LONNIE GRIFFIN, aka "LIL' LONNIE";
 vv. OCTAVIA LOGAN, aka "RERE";
 ww. DEMOND ROBINSON, aka "MANO";
 xx. GARY COVENS, aka "BIG MAN";
 yy. TERRY COVENS, aka "BRAIN";
 zz. WILLIE COVENS, aka "ANNIE," aka "WILLIE G";
 aaa. PATRICK FRAZIER;
 bbb. ALPHONSO STEWART;

ccc. JEFFREY BOWEN, aka "LORD," aka "JEFF"; and
ddd. OAIS COBBIN

with conspiring with each other and with others known and unknown to the United States to knowingly and intentionally possess with intent to distribute and to distribute controlled substances, namely, in excess of 50 grams of mixtures containing cocaine base (in the form of crack cocaine), in excess of 5 kilograms of mixtures containing cocaine, in excess of 1 kilogram of mixtures containing heroin, and marijuana, in violation of Title 21, United States Code, section 841(a)(1), in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

5. This Affidavit is also made for the purpose of establishing probable cause in support of warrants to seize the vehicles listed below, which are further described below and in Attachment B.

a. 2003 Chevrolet Monte Carlo – VIN 2G1WX12K839444899 (registered to RONALD TURNER) *see* ¶¶30, 34;

b. 2002 Chevrolet Tahoe Z-71 – VIN 1GNEK13Z62R265916 (registered to TERRELL COVENS and TREVEL COVENS) *see* ¶30;

c. 2003 Infiniti – VIN JNKCV51E83M000944 (registered to Individual P) *see* ¶30; and

d. 2006 Chevrolet Equinox – VIN 2CNDL63F566082394 (registered to KENNETH MARSHALL) *see* ¶75.

II. OVERVIEW OF CONSPIRACY

6. In January 2004, the Chicago Police Department (“CPD”) began investigating a drug trafficking organization led by members of the NEW BREEDS street gang, a faction of the Black Gangster Disciples street gang, that operates in and around a housing complex known as “The Square.” The Square is located in the vicinity of 18th Street, 19th Street, Keeler Avenue, and Karlov Avenue, in Chicago, Illinois. The Square is Section 8 housing (low income) and is composed of approximately eight buildings that are three stories in height (not including any basement). Part of The Square is surrounded by a brick wall that controls ingress and egress from that portion of the property.

7. In July 2004, the FBI joined the CPD in its investigation of the drug trafficking operation in The Square. During the investigation, CPD and FBI identified that members of the COVENS family, specifically Tylon Covens¹, Terrence Covens², and TERRELL COVENS run organizations that work in tandem to distribute controlled substances in The Square. Those organizations distribute “rocks” (crack cocaine), “blows” (heroin), and “weed” (marijuana), to customers via hand-to-hand transactions in and around The Square. The drug operation in The Square operates twenty-four hours a day, seven days a week, generating, on average, over \$15,000 in drug sales per day. All drug sales in The Square are completed on behalf of the COVENS family, or with the explicit permission of the COVENS family, which is typically obtained by paying a “tax” to the COVENS family. Members of the drug operation in The Square obtain, possess, and use firearms in order to both protect and further advance the drug operation.

¹Tylon Covens died on approximately November 27, 2005, as a result of gunshot wounds.

²In the Summer of 2005, Terrence Covens was shot to death in The Square.

8. TERRELL COVENS, the current leader of the drug operation in The Square, relies on his close associates, including RONALD TURNER, TREVEL COVENS, and LAVELL COVENS to run the drug operation in The Square. Suppliers provide the drug operation with cocaine, crack cocaine, heroin, and marijuana. Members of the drug operation cook the cocaine into crack cocaine, and package the crack cocaine, heroin, and marijuana for sale. The drug operation relies on members of the conspiracy to store the prepackaged, and packaged drugs in common areas and residences in and around The Square. “Runners” distribute the packaged drugs to “shift supervisors,” who supervise the drug operation in The Square. The shift supervisors distribute the drugs to secondary supervisors, who distribute the drugs to “pack workers,” who work shifts selling the drugs to customers in and around The Square. Certain shift supervisors are responsible for collecting the proceeds of the drug sales in The Square, which RONALD TURNER retrieves from The Square on behalf of the drug operation.

9. The following is a brief summary of the roles each co-conspirator played in the conspiracy and the paragraphs in this Affidavit pertaining to each:

ORGANIZERS/LEADERS

A. **TERRELL COVENS:** is the leader of the drug operation in The Square. TERRELL COVENS controls the purchase and distribution of narcotics and firearms in The Square. TERRELL COVENS directs others, such as RONALD TURNER, TREVEL COVENS, and LAVELL COVENS to coordinate the distribution of crack cocaine, heroin, and marijuana. *See* ¶¶17c; 22-31; 32g; 35; 36; 41-43; 46-49; 55; 83-84; 85c; 89; 98; 114-115; 118; 129; 134c; 139-140; 143; 147-152; 154-157; 172; 175; 177; 183; 193; 212; 218; 223; and 245-246.

B. RONALD TURNER: is a leader of the drug operation in The Square, who works for TERRELL COVENS coordinating the distribution of controlled substances in The Square and the collection of drug proceeds from The Square. *See* ¶¶17b; 17d; 26b; 28a-b; 30;31-37; 43c; 98; 114-117; 122; 136; 138-139; 148; 157-158; 223; and 236-237.

C. TREVEL COVENS: is a leader of the drug operation in The Square, who works for TERRELL COVENS coordinating the distribution of heroin in The Square. TREVEL COVENS has also coordinated the distribution of crack cocaine in The Square. *See* ¶¶38-44; 55a; 84; 104; 118; 122-123; 146; 166; 190; 217-218; and 242.

D. LAVELL COVENS: is a leader of the drug operation in The Square, who works for TERRELL COVENS coordinating the distribution of crack cocaine in The Square. *See* ¶¶45-49;84; 98; 155;210; 225; 240; and 246.

SUPPLIERS/BROKERS

E. KELVIN JACKSON: is a supplier of cocaine to the drug operation in The Square. *See* ¶¶17c; 29-30; 37; 50; 139.

F. RANDALL BREWSTER: is a supplier of crack cocaine and heroin to the drug operation in The Square. *See* ¶¶17f; 44; 51-55; 57b; 58-59; 61-64; 96; 106-108; 110; 131; 135; 159; and 255-256.

G. KENDALL BREWSTER: is a broker who assists RANDALL BREWSTER in distributing crack cocaine and heroin in The Square. KENDALL BREWSTER also serves as a shift supervisor for drug sales in The Square. *See* ¶¶44; 51-60; 62; 64; 89; 96; 106-108; 110; 133; 135; 187; and 255-256.

H. MARCELL BREWSTER: is a broker who assists RANDALL BREWSTER in distributing crack cocaine and heroin in The Square. *See* ¶¶53-54; 59; 61-64; 96; and 135.

I. TERRANCE BREWSTER: is a broker who assists RANDALL BREWSTER in distributing crack cocaine and heroin in The Square. *See* ¶¶53-54; 59; 62; 64-65; 96; and 135.

J. LAPRIEST GARY: is a supplier of crack cocaine to the drug operation in The Square. *See* ¶¶66-70; 81; and 86.

K. WAYNE BROWN: is a supplier of crack cocaine to the drug operation in The Square. *See* ¶¶71-73; 86; 88; 93; and 249-250.

L. KENNETH MARSHALL: is a supplier of crack cocaine to the drug operation in The Square. *See* ¶¶74-77; and 97.

M. EARNEST BROWN: is a supplier of narcotics to The Square. *See* ¶¶27; 77-80; 105; and 237.

N. ADONIS HOUSE: is a broker of crack cocaine transactions in The Square. *See* ¶¶12; 23-24; 67-68; 72-73; 81-90; 93; 95; 101-102; 185; and 249-250.

O. MARCUS BROWN: is a broker of crack cocaine transactions, and a shift supervisor of drugs sales in The Square. *See* ¶¶12; 14b; 17a; 27; 51-53; 56-58; 61-62; 64; 72-80; 86-99; 101-105; 126-127; 131-135; 159-162; 171-172; 185-186; 188-189; 194; 202; 205-209; 212; 223; 235-236; 244; and 249-256.

P. JESSICA BROWN: is a broker of crack cocaine transactions who assists WAYNE BROWN and MARCUS BROWN in their transactions. *See* ¶¶71-72; 86-87; 93; and 100-105.

Q. JASON RATLIFF: is a supplier of firearms to The Square, and a wholesale crack cocaine customer of RANDALL BREWSTER's. *See* ¶¶106-110.

R. JON RATLIFF: is a supplier of firearms to The Square, and a wholesale crack cocaine customer of RANDALL BREWSTER's. *See* ¶¶108-111.

SHIFT SUPERVISORS/RUNNERS

S. QUENTIN REED: is a shift supervisor of the crack cocaine sales in The Square. REED receives some of the crack cocaine from runner LEVELL HICKS. *See* ¶¶28a; 28e; 112-118; 122; 129; and 138.

T. LEVELL HICKS: is a runner of crack cocaine for the drug operation in The Square. HICKS provides some of the crack cocaine to shift supervisor QUENTIN REED. *See* ¶¶43; 112; 114; 118-122; 137; 146; 217; and 219.

U. KENYATI JORDAN: is a shift supervisor/runner for the drug operation in The Square. *See* ¶¶38; 123-129; 176; 192; and 198.

V. KENNETH STARKS: is a shift supervisor/runner for the drug sales, including crack cocaine, in The Square. *See* ¶¶130-131; and 196.

W. JOHNEAK JOHNSON: is a runner/worker for the drug operation in The Square. *See* ¶¶53; 57; 59; 64; 96; 132-135; 209; and 236.

X. ALMONETTA HEMPHILL: is a runner/holder of drugs, including crack cocaine, in The Square. ALMONETTA HEMPHILL also assists RONALD TURNER in obtaining wholesale cocaine for the drug operation. *See* ¶¶30; 37; 121; 136-139; 160; and 219.

Y. CALVIN MCWRIGHT: is a shift supervisor of drug sales, including crack cocaine, in The Square during the conspiracy. *See* ¶¶140-142.

Z. LAMONT HARRIS: is a runner of drugs, namely crack cocaine, for the drug operation in The Square. *See* ¶¶28d; 37; 45; 116; 143-151; 189; 221; and 233.

AA. TION NEWTON: is shift supervisor for the crack cocaine sales in The Square. *See* ¶¶46b; 152-157; 197; 210; and 234.

WORKERS

BB. RITA HEMPHILL: is a worker for the drug operation in The Square. HEMPHILL is also a holder of drugs, including crack cocaine, for the drug operation. *See* ¶¶32; 158-162; and 236.

CC. SHALONDA BROWN: was a packager and holder of narcotics for the drug operation in The Square. SHALONDA BROWN is currently a worker selling drugs in The Square. *See* ¶¶26a; 38-39; 83; 104; 128; 163-173; 175; 193; 199; 202; and 235.

DD. QUANTA WRIGHT: is a holder of drugs and worker for the drug operation in The Square. *See* ¶¶67; and 173-176.

EE. ELGIN CURB: was a worker for the drug operation in The Square, but has recently been promoted to the role of runner. *See* ¶¶177-179; and 182.

FF. LOUIS EUBANKS: is a worker for the drug operation in The Square. *See* ¶¶178; and 180-182.

GG. SAMUEL HARRIS: is runner of drugs, namely crack cocaine, for the drug operation in The Square. *See* ¶¶38; 45; 80; 183-189; 193; 202; and 244.

HH. SHAUN JAMES: is a holder of heroin, and worker for the drug operation in The Square. *See* ¶¶125; 148-149; 190-194; 198; 202; 235; and 244.

II. SHANTA JAMES: is a holder of heroin, and worker for the drug operation in The Square. *See* ¶¶125; 130; 153; 184; 192; and 195-199.

JJ. FREDERICK YOUNG: is a worker for the drug operation in The Square. *See* ¶¶90; 164; and 200-202.

KK. PRENTICE EARL: is a worker who primarily sells heroin for the drug operation in The Square. *See* ¶¶203-208.

LL. JERMAINE HARRIS: is a worker for the drug operation in The Square. *See* ¶¶134; 209; and 235.

MM. DAVID HARRIS: is a worker for the drug operation in The Square. *See* ¶¶193; 210-212.

NN. DONRIE ROBINSON: is a worker for the drug operation in The Square. *See* ¶¶213-214.

OO. RODNEY WILLETT: is a worker for the drug operation in The Square. *See* ¶¶43; 121; and 215-218.

PP. KENNETH SYKES: is a worker for the drug operation in The Square. *See* ¶¶120; 137; and 219-221.

QQ. HERBERT ROBINSON: is a worker for the drug operation in The Square. *See* ¶¶148; and 222-223.

RR. IVAN WHITE: is a worker for the drug operation in The Square. *See* ¶¶224-225.

SS. JACQUELINE HOLMAN: is a worker for the drug operation in The Square. *See* ¶¶226-227.

TT. SALVATORE BASS: is a worker for the drug operation in The Square. *See* ¶¶32a; and 227-229.

UU. LONNIE GRIFFIN: is a worker for the drug operation in The Square. *See* ¶¶184; and 230-231.

VV. OCTAVIA LOGAN: is a worker for the drug operation in The Square. *See* ¶¶232-235; and 241.

WW. DEMOND ROBINSON: is a worker for the drug operation in The Square. *See* ¶¶134; and 236.

XX. GARY COVENS: is a worker for the drug operation in The Square. *See* ¶¶237-241.

YY. TERRY COVENS: is a worker for the drug operation in The Square. *See* ¶¶43; 98; 116; 121; 179; 217; 233; and 239-244.

ZZ. WILLIE COVENS: is a worker on behalf of the drug operation in The Square. *See* ¶¶233; and 245-248.

AAA. PATRICK FRAZIER: is a courier for WAYNE BROWN. *See* ¶¶73; 88; 95; and 249.

BBB. ALPHONSO STEWART: is a courier for WAYNE BROWN. *See* ¶¶73; 88; 95; and 250.

WHOLESALE CUSTOMERS

CCC. JEFFREY BOWEN: is a wholesale customer of crack cocaine from the drug operation in The Square. *See* ¶¶43c; 52; 58; and 251-255.

DDD. OAIS COBBIN: is a wholesale crack cocaine customer of the drug operation in The Square. *See* ¶¶52; 58; and 255-256.

III. OVERVIEW OF INVESTIGATION

A. The Ruse Officers

10. This investigation has utilized a strategy in which CPD officers have acted as corrupt police officers with members of the conspiracy, and have agreed to accept guns, money, and/or drugs in exchange for their release from detention, thereby permitting the drug operation in The Square to continue. As set forth below, this investigative technique has resulted in the seizure of narcotics, firearms, and United States Currency. During the application of this technique, members of the conspiracy have made statements to the officers in which they have admitted their own role in the conspiracy, identified the roles of some of their co-conspirators, and have explained the nature and operation of the conspiracy.

B. The Undercover Employees

11. CPD Undercover Officers: As set forth in Section IV, this investigation has utilized a number of undercover officers (hereinafter “UCOs”) to conduct controlled purchases of narcotics from members of the conspiracy inside of The Square.

12. FBI Undercover Employees:

a. This investigation has utilized two undercover agents: undercover employee one (hereinafter “UCE1”) and undercover employee two (hereinafter “UCE2”). Confidential witness 2 (identified below) introduced UCE1 and UCE2 to members of the conspiracy, namely ADONIS HOUSE and MARCUS BROWN. UCE1 and UCE2 held themselves out as brothers and drug traffickers from Wisconsin, who sought to obtain cocaine and crack cocaine from suppliers in the Chicago area.

b. During the course of the investigation, UCE1 and UCE2: conducted consensually recorded conversations with members of the conspiracy; provided ADONIS HOUSE with a cellular telephone; provided MARCUS BROWN with a cellular telephone, **Target Phone One** (identified below), in October 2005; and conducted controlled and surveilled purchases of narcotics from members of the conspiracy. Those purchases include: 1) approximately 4 ounces of crack cocaine from ADONIS HOUSE on or about April 5, 2005; 2) approximately 4 ½ ounces of crack cocaine from ADONIS HOUSE on or about May 20, 2005; 3) approximately 9 ounces of crack cocaine from ADONIS HOUSE and MARCUS BROWN on or about October 18, 2005; 4) approximately 9 ounces of crack cocaine from ADONIS HOUSE and MARCUS BROWN on or about November 10, 2005; and 5) approximately 4 ½ ounces of crack cocaine from ADONIS HOUSE and MARCUS BROWN on or about December 15, 2005.

C. The Confidential Witnesses

13. Confidential Witness 1 ("CW1")

a. CW1 resided inside of The Square for approximately six years. CW1 provided credible, reliable, timely information to the FBI from July 15, 2004 to approximately October 26, 2004. During this time period, CW1 provided information, in person, or telephonically, to FBI Agents and CPD officers. A substantial portion of CW1's information regarding the NEW BREED street gang has been corroborated by independent investigation that includes physical surveillance, interviews of NEW BREED street gang members in the area of The Square, telephone record analysis, and subsequent Title III interceptions.

b. CW1 agreed to cooperate in the instant investigation because of his/her interest in curtailing the drug operation in The Square. During the course of his/her cooperation

with the FBI and the CPD in this investigation, CW1 received total payments of approximately \$3,500.

c. CW1 has admitted to buying crack cocaine from individuals in The Square on behalf of a family member of CW1 prior to his/her cooperation with the FBI. To the best of your Affiant's knowledge, CW1 does not have a criminal history based on a criminal history request that was conducted prior to establishing CW1 as a cooperating witness with the FBI. Subsequent criminal history requests confirm that CW1 has no criminal history. In approximately November of 2004, CW1 chose to discontinue his/her cooperation with the FBI due to CW1's personal issues. Your Affiant has not had any conversations with CW1 since approximately November 2004.

14. Confidential Witness 2 ("CW2")

a. CW2 is a former member of the Gangster Disciple ("GD") street gang in Chicago, Illinois. CW2 has been providing reliable, timely information to the FBI since approximately February 2005. During this time, FBI Agents have spoken to CW2 in person, or telephonically, on numerous occasions. A substantial portion of CW2's information regarding the COVENS family and their associates have been corroborated by independent investigation that includes physical surveillance, interviews of NEW BREED street gang members in the area of The Square, telephone record analysis, UCE1 and UCE2, other cooperating witnesses, CW2's participation in several consensually monitored telephone and non-telephonic conversations with several members of the NEW BREED street gang, and Title III interceptions.

b. CW2 has agreed to cooperate with the government in hopes of receiving a reduced sentence on federal drug charges. While no formal agreement has been reached, CW2 has been advised that if his/her cooperation is considered significant, the government will enter into a plea agreement with CW2 in which the government will seek a reduction of CW2's sentence based

on his/her cooperation. CW2 has been arrested approximately 12 times for offenses which include driving on a suspended/revoked license, drug possession and/or conspiracy, criminal trespass to a vehicle, gambling, disorderly conduct, and possession of a firearm. CW2 has 3 convictions. The FBI has supplied CW2 with a cellular telephone (and initially provided minutes for that cellular telephone) to facilitate CW2's contact with the FBI and various potential targets of the investigation. Other than the cellular telephone and paid minutes placed on the phone, CW2 has not received any monetary benefit from the FBI.³ Finally, I am aware that while on pretrial release, and while cooperating with the FBI in this investigation, CW2 has been reported to the district court for various violations of pretrial release conditions, including failure to appear on traffic warrants and marijuana use.

D. The Cooperating Informant ("CI")

15. The CI has been providing timely, reliable information regarding this investigation to the FBI since approximately February 2006. During this time, FBI Agents have spoken to the CI in person, or telephonically, on numerous occasions. A substantial portion of the CI's information regarding the COVENS family and their associates have been corroborated by independent investigation that includes physical surveillance, interviews of NEW BREED street gang members in the area of The Square, telephone record analysis, UCE1 and UCE2, other cooperating witnesses, and Title III intercepts.

³On or about March 8, 2006, CW2 conducted a controlled purchase of 4 ½ ounces of crack cocaine from MARCUS BROWN. Law enforcement provided CW2 with \$2800 to purchase the crack cocaine and an additional \$300 that CW2 was instructed to give to BIG G. CW2 paid BIG G \$2800 for the crack cocaine, but initially only provided BIG G with \$150 of the \$300. Later on that same day, upon the request of law enforcement, CW2 provided BIG G with the remaining \$150.

16. To date, the CI has been paid \$500 for the information provided. The FBI has provided the CI with a cellphone in order to further the investigation. The FBI has also paid to put minutes on the cellphone. The CI has been intercepted making criminally pertinent calls during the course of the instant Title III investigation. However, the CI is not cooperating in an attempt to receive a reduced sentence on a current case, or consideration with respect to charging decisions in an ongoing investigation because the FBI has not informed the CI that he/she has been intercepted during the instant Title III investigation. As a result, the CI is unaware of the evidence that has been developed against him/her. The CI has six convictions: four for possession of a controlled substance; a conviction for aggravated unlawful use of a weapon; and a probation violation. The CI is currently on parole. The CI also has several other arrests for various offenses, including drug offenses, property offenses, and domestic battery offenses.

E. The Wiretap Investigation

17. Between December 2005 and May 2006, the FBI obtained court authorization to intercept and intercepted certain wire communications over the following telephones used by members of the alleged conspiracy:

a. **Target Phone One.** On December 2, 2005, January 17, 2006, and February 17, 2006, Chief Judge Charles P. Kocoras entered orders authorizing the interception of wire communications to and from (773) 562-7641, ESN 04CACE6A, subscribed to Deborah Laney, used by MARCUS BROWN, P.O. Box 1971, c/o Market Wise Investments, Chicago, IL 60690, operated on the network of service provider Sprint and Virgin Mobile (hereinafter “**Target Phone One**”).

b. **TURNER Target Phone.** On February 15, 2006 and April 4, 2006, Chief Judge Charles P. Kocoras entered orders authorizing the interception of wire communications to and from the cellular telephone bearing (773) 531-3358, ESN 010417005537927, subscribed to Carolyn

Turner, used by RONALD TURNER, 3444 W. 12th Place, Chicago, Illinois 60623, operated on the network of service provider Cingular Wireless (hereinafter “**TURNER Target Phone**”).

c. **COVENS Target Phone.** On March 9, 2006, Chief Judge Charles P. Kocoras entered an order authorizing the interception of wire communications to and from the cellular telephone assigned telephone number (773) 828-2233, Push-to-talk 183*704*697, IMSI 316010101842335, subscribed to Mike Jones, used by TERRELL COVENS, 1415 S. Tripp Avenue, Chicago, Illinois, 60623, operated on the network of service provider Nextel Communications (hereinafter “**COVENS Target Phone**”).

d. **TURNER Target Phone Two.** On March 29, 2006, Chief Judge Charles P. Kocoras entered an order authorizing the interception of wire communications to and from (773) 844-3074, IMSI 310380108279835, subscribed to Carolyn Turner, used by RONALD TURNER, at 3444 W. 12th Place, Chicago, IL 60623, operated on the network of service provider Cingular Wireless (hereinafter “**TURNER Target Phone Two**”).

e. **JACKSON Target Phone.** On April 18, 2006, Chief Judge Charles P. Kocoras entered an order authorizing the interception of wire communications to and from (773) 403-0321, ESN 05015315351, subscribed to Lakeshia Thomas, used by KELVIN JACKSON, 1525 S. Springfield Avenue, Floor 2, Chicago, Illinois 60623, operated on the network of service provider US Cellular (hereinafter “**JACKSON Target Phone**”).

f. **BREWSTER Target Phone.** On April 20, 2006, Chief Judge Charles P. Kocoras entered an order authorizing the interception of wire communications to and from (773) 209-4530, ESN 28EE836C, subscribed to Jere Williams, used by RANDALL BREWSTER, 8200 S. Ingleside Avenue Apt. 2, Chicago, Illinois, 60619, operated on the network of service provider Sprint (hereinafter “**BREWSTER Target Phone**”).

18. In many of the intercepted and consensually recorded calls, coded language was used to conceal the true nature of the telephone calls. At various points in this Affidavit, I have placed in brackets or parentheses my understanding of what was being said during those calls. My understanding is based on the contents and context of the conversations, my experience as a law enforcement officer, and the experience of other law enforcement agents and officers in this investigation. The times listed for these calls are approximate. Finally, the summaries below do not include all potentially criminal calls intercepted during the period of interception, or all statements or topics covered during the course of intercepted conversations. They do not represent finalized transcripts and may not represent the entire conversation that occurred between the identified individuals.

F. Surveillance

19. During the course of the investigation, law enforcement officers have surveilled the conduct of co-conspirators in and around The Square. The surveillance has included observations of hand-to-hand drug transactions in The Square. Those transactions involve co-conspirators directing drug customers to workers in The Square who can supply the customers with drugs. The workers identify those drugs by calling out slang terms including “blows” (heroin), “rocks” (crack cocaine), and “dro” (marijuana). The customers provide the workers with cash for the requested drugs, which the workers then provide directly to the customers.

G. Seizures

20. The investigation has resulted in numerous narcotics seizures, some of which are detailed in Section IV, that total more than of 1000 grams of cocaine base, in excess of 2000 grams of cocaine, and in excess of 250 grams of heroin.

21. The investigation has resulted in the seizure of over 20 firearms. Some of those seizures are detailed in Section IV.

IV. PROBABLE CAUSE FOR REQUESTED COMPLAINT

ORGANIZERS/LEADERS

A. TERRELL COVENS⁴

CW/CI Information

22. During the summer of 2004, CW1 provided the following historical information. CW1 advised law enforcement that Tyrone Covens, aka “Tylon”, aka “TY”, “Tylone”, and “T.Y.”, was in charge of the narcotics operation in The Square. CW1 further stated that TERRELL COVENS, aka “RELL,”⁵ was second in command of the narcotics operation in The Square, is violent, and also sold his own narcotics.

23. On approximately June 30, 2005, CW2 spoke with TERRELL COVENS while COVENS was at a parking lot in The Square. CW2 stated that TERRELL COVENS was very cautious and approached CW2 with his hand in his waistband, suggesting to CW2 that TERRELL COVENS was carrying a firearm. CW2 advised that he/she had a conversation with TERRELL

⁴The identification of TERRELL COVENS in this Affidavit is based upon the following: First, CW1, CW2, and the CI have identified TERRELL COVENS. Second, law enforcement has been able to identify TERRELL COVENS’s voice because that voice has been intercepted numerous times, particularly on **TURNER Target Phone** and **COVENS Target Phone**; because TERRELL COVENS was identified or identified himself in many of those calls with the same alias name (“RELL” or “RELLO”); and because the voice was consistently associated with the same phone numbers, particularly **COVENS Target Phone**. Third, during particular intercepted calls, TERRELL COVENS arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with TERRELL COVENS during which TERRELL COVENS identified himself.

⁵CW1 also provided an alias for TERRELL COVENS as “TERRENCE COVENS.” Other than CW1's use of this alias, I am not aware of TERRELL COVENS using the alias “TERRENCE COVENS.”

COVENS. CW2 told TERRELL COVENS about two prior instances in which “DON” (ADONIS HOUSE) had brokered crack cocaine transactions with UCE1. Those transactions are described in greater detail below. CW2 told TERRELL COVENS that the first drug buy did not go very well because the crack cocaine was not very good. CW2 advised that the second drug buy was good because HOUSE got the crack cocaine from "Chuck" (Terrence Covens). CW2 stated that TERRELL COVENS nodded his head and stated “yeah.” TERRELL COVENS told CW2 that he makes his money by bagging crack cocaine, which is of poor quality, and selling it in The Square. CW2 asked TERRELL COVENS for a phone number by which CW2 could contact TERRELL COVENS. TERRELL COVENS provided his number, and told CW2 to give him a call when CW2 was ready to purchase narcotics.

24. In approximately September 2005, CW2 advised that he/she was at ADONIS HOUSE's residence located inside of The Square when HOUSE began to talk to CW2 about the drug operation inside of The Square. Among other things discussed, HOUSE stated that when Terrence Covens was alive, he knew how to run the business, but TERRELL COVENS did not.

25. In approximately February 2006, the CI identified “RELL” (TERRELL COVENS) as the person who oversees the drug operation in The Square. The CI explained that TERRELL COVENS is responsible for supplying crack cocaine to the drug operation inside of The Square in the form of “capsules” (capsules that contain crack cocaine). The CI also stated that TERRELL COVENS is the source of “dro” (marijuana). The CI explained that anyone who wants to sell narcotics inside of The Square must obtain TERRELL COVENS's permission to do so. Furthermore, if the person who wants to sell narcotics inside of The Square is not a family member of the COVENS's, TERRELL COVENS will charge a “tax” of \$500. According to the CI, the drug operation in The Square operates 24 hours a day, 7 days a week.

Non-Title III Information/Seizures

26. During the course of the investigation, a number of co-conspirators made statements identifying TERRELL COVENS as the leader of the drug trafficking in The Square. For example:

a. On or about May 12, 2005, SHALONDA BROWN told FBI agents that TERRELL COVENS is one of the members of the COVENS family that runs the drug operation in The Square.

b. On or about November 17, 2005, RONALD TURNER had a conversation with law enforcement regarding TERRELL COVENS's role in drug trafficking in The Square. During that conversation, TURNER advised that "RELL" (TERRELL COVENS) ran the drug operation, but TERRELL COVENS allowed TURNER to basically run the show. TURNER advised that they (TURNER and TERRELL COVENS) sold narcotics 24 hours a day, and that the evening time was the busiest.

Title III Calls/Seizures

27. During the course of the investigation, criminally pertinent phone calls were intercepted in which co-conspirators discussed TERRELL COVENS's role in the drug operation in The Square. For instance, on or about December 5, 2005, at approximately 6:50 p.m., EARNEST BROWN called MARCUS BROWN on **Target Phone One** (call session #259). During the conversation, MARCUS BROWN discussed a recent homicide in The Square, which MARCUS BROWN attributed to "TY" (Tylon Covens, who is now deceased) and TERRELL COVENS. In explaining the homicide, MARCUS BROWN indicated that the killing was of a rival who was attempting to sell drugs in The Square and compete with the COVENS's operation. EARNEST BROWN asked MARCUS BROWN whether TERRELL COVENS was still selling drugs in The Square. MARCUS BROWN responded in the affirmative, and indicated that TERRELL COVENS and his associates did not even stop working after "Chuck" (Terrence Covens) got killed.

28. During the course of the investigation, criminally pertinent conversations were intercepted between TERRELL COVENS and other co-conspirators, in which TERRELL COVENS discussed his involvement in the drug operation in The Square. For instance:

a. On or about February 16, 2006, at approximately 9:13 p.m., TERRELL COVENS, using **COVENS Target Phone**, called RONALD TURNER on **TURNER Target Phone** (call session #84). During the conversation, TERRELL COVENS asked where TURNER was at. TURNER replied at the "Low Low" (street term for an apartment in which narcotics are hidden). TERRELL COVENS replied that he and "SWINDLE" (QUENTIN REED) were on the way to the aforementioned apartment. TURNER told TERRELL COVENS that he was almost done cutting, cooking, or packaging narcotics anyway.

b. On or about February 17, 2006, at approximately 10:12 p.m., TERRELL COVENS, using **COVENS Target Phone**, called TURNER on **TURNER Target Phone** (call session #329). During the conversation, TERRELL COVENS told TURNER that he (TURNER) was going to need to "slide" (street term to come to where another person is at) and get the narcotics TURNER had cooked, cut or packaged and get them to TERRELL COVENS. TURNER replied that he had some narcotics in his "crib" (street term for residence). TERRELL COVENS asked TURNER if he (TURNER) had taken "one of them" (one quantity of narcotics) "over there" (The Square). TURNER replied that he took all of the narcotics he had.

c. On or about February 19, 2006, at approximately 11:32 a.m., **TURNER Target Phone** received a call from COVENS on **COVENS Target Phone** (call session #655). During the conversation, COVENS told TURNER to "break that [quantity of narcotics] in half, you know what I'm saying, and only take five of them [quantity of five of a particular type of narcotics], leave six [quantity of six of a particular type of narcotics] of them, I'm gonna get them [the narcotics] later."

d. On or about March 29, 2006, at approximately 8:28 p.m., QUENTIN REED, using (773) 678-2147, called TERRELL COVENS on **COVENS Target Phone** (call session #1605). REED said "Hey 'RELLO' [TERRELL COVENS] . . . 'FRO FRO' [LAMONT HARRIS] down [selling narcotics]?" COVENS said "yeah" and asked who was on the phone. REED said "SWINDLE" (QUENTIN REED). COVENS said "yeah, but the D's [detectives/police] in the back lot [of The Square] though."

29. During the investigation, criminally pertinent calls were intercepted in which TERRELL COVENS spoke to co-conspirators who supply the drug operation in The Square with narcotics and/or firearms. For instance:

a. On or about March 12, 2006, TERRELL COVENS, using **COVENS Target Phone**, had a series of conversations with KELVIN JACKSON on **JACKSON Target Phone** regarding TERRELL COVENS's purchase of two kilograms of cocaine from JACKSON. Initially, (call session #128), JACKSON asked what the order was, and COVENS said a "deuce" (two of a quantity of narcotics). JACKSON stated that it would be an even 40 (\$40,000). Later (call session #221), JACKSON told COVENS to put "an extra dollar with it" (add \$1000 to the \$40,000 already discussed). JACKSON and COVENS made arrangements to meet in Chicago (call session #224) at which time COVENS could provide JACKSON with the money. After the meeting, (call session #237), JACKSON told COVENS that COVENS had not put the "other one" (\$1,000) in there with the \$40,000. JACKSON told COVENS that the money had come out to "39960" (\$39,960). JACKSON told COVENS to let him call COVENS right back so COVENS could come pick "it" (the cocaine which COVENS had paid for) up. When JACKSON called COVENS back (call session #239), JACKSON explained to COVENS that JACKSON's supplier had thought that JACKSON had only wanted "one" (kilogram of cocaine), so he only brought "one" (kilogram of cocaine) out. As a result, JACKSON had to wait until tomorrow morning to get the other "one" (other kilogram of cocaine). COVENS told JACKSON that was cool. Based on my training and experience, I know that kilograms of cocaine in Chicago can cost approximately \$20,000 per kilogram. Thus, based on my training and experience, and my involvement in this investigation, I believe that COVENS and JACKSON were discussing JACKSON's sale of two kilograms of cocaine to COVENS.

b. On or about March 26, 2006, at approximately 2:55 p.m., KELVIN JACKSON, using **JACKSON Target Phone**, called TERRELL COVENS on **COVENS Target Phone** (call session #1435). During the call, JACKSON asked COVENS if he was trying to do

something small. COVENS said “no, I was just trying to grab something.” JACKSON said “right, right, cuz I’m fixin’ [getting ready] to go bump heads [meet] with them [suppliers of firearms] right now . . . I’m gonna grab one [firearm] right quick.” COVENS said that unless JACKSON could get more than one kind of firearm, COVENS would do something with that. JACKSON said that his supplier “do [has more than one kind of firearm], but I don’t know what [type of firearms] he [the supplier] got.” COVENS said “right.” JACKSON said “they got more than one [type of firearm], he [the supplier] just told me they have one like an AK-47 [automatic weapon] and an H Star [another type of weapon], both of them look good.” COVENS and JACKSON then discussed what COVENS was willing to pay for each firearm.

30. On or about April 6, 2006, RONALD TURNER and TERRELL COVENS made partial payment to KELVIN JACKSON for 2 kilograms of cocaine. On or about April 7, 2006, KELVIN JACKSON distributed the 2 kilograms of cocaine to TERRELL COVENS through RONALD TURNER and ALMONETTA HEMPHILL. Law enforcement subsequently seized the 2 kilograms of cocaine from RONALD TURNER.

a. On April 6, 2006, at approximately 6:29 p.m., KELVIN JACKSON called TERRELL COVENS on **COVENS Target Phone** (call session #2436). During the call, JACKSON and COVENS agreed to meet at 8:00 p.m.

b. Between approximately 7:13 p.m. and 7:59 p.m., TERRELL COVENS, using **COVENS Target Phone**, had a series of conversations with RONALD TURNER (call sessions ##2437, 2441, and 2443) in which COVENS and TURNER discussed TURNER collecting money on COVENS’s behalf from MARCUS BROWN and from TURNER’s house.

c. At approximately 8:00 p.m., TERRELL COVENS, using **COVENS Target Phone**, called KELVIN JACKSON (call session #2444) and told JACKSON that he wanted to meet

in 20 minutes. JACKSON stated that he was going to park on “Gladys” (a street in Chicago) and then stated that they could meet in the same place. COVENS agreed.

d. Surveillance subsequently observed RONALD TURNER leave his home at 3444 W. 12th Place in Chicago, driving a black Chevrolet Monte Carlo bearing Illinois Registration 5743814 (hereinafter “the Monte Carlo”)⁶, and meet with TERRELL COVENS, who was driving a Chevy Z-71 Tahoe bearing Illinois registration 9623320 (hereinafter “the Tahoe”)⁷, at 2344 W. Jackson in Chicago. While at that location, at approximately 8:35 p.m., TERRELL COVENS, using **COVENS Target Phone**, called KELVIN JACKSON (call session #2446) and told JACKSON that he was on his way. Surveillance followed COVENS, who was driving the Tahoe, and TURNER, who was driving the Monte Carlo, to a parking lot on Harrison Street west of Laramie in Chicago, where COVENS and TURNER arrived at approximately 8:58 p.m.

e. At approximately 8:58 p.m., RONALD TURNER called TERRELL COVENS on **COVENS Target Phone** (call session #2450). TURNER asked COVENS if TURNER should give “it” (money) to KELVIN JACKSON. COVENS asked TURNER if he saw JACKSON in a car in the parking lot. TURNER said yes. COVENS told TURNER to give “it” (money) to JACKSON so they can go about their business.

f. At approximately 9:00 p.m., surveillance observed TERRELL COVENS and RONALD TURNER leave the area in their respective vehicles. Law enforcement conducted a

⁶According to Illinois Secretary of State records, the Monte Carlo is a 2003 model, VIN 2G1WX12K839444899, and is registered to RONALD TURNER, 3444 W. 12th Place, Chicago, Illinois 60623.

⁷According to Illinois Secretary of State records, the Chevy Z-71 Tahoe is 2002 model, VIN 1GNEK13Z62R265916, and is registered to TERRELL COVENS and TREVEL COVENS, 1908 S. Springfield, Chicago, Illinois 60623.

traffic stop of TURNER's Monte Carlo during which officers identified the occupants as TURNER and Individual A. Law enforcement searched the vehicle, but did not find any drugs, money, or other contraband.

g. At approximately 9:08 p.m., KELVIN JACKSON called TERRELL COVENS on **COVENS Target Phone** (call session #2454). COVENS told JACKSON to watch for police because they just stopped RONALD TURNER. JACKSON thanked COVENS for the information and told COVENS that he only needed an hour to complete the transaction. At approximately 9:31 p.m., TERRELL COVENS, using **COVENS Target Phone**, called RONALD TURNER (call session #2456) and told COVENS that he was on his way back to the "low low" (The Square) and that the police had let him go without searching his car very well.

h. At approximately 10:12 p.m., KELVIN JACKSON called TERRELL COVENS on **COVENS Target Phone** (call session # 2483). JACKSON told COVENS that he was going to "roll on" (travel to) COVENS. COVENS told JACKSON not to meet with COVENS because the police are present in and around COVENS's location. JACKSON said that the police were "hot" (were present) at his location as well. COVENS asked JACKSON if he could wait to complete the transaction until the morning or later that same evening. JACKSON stated that he could wait, and then asked what was in the bag that TURNER gave him, because he did not know. COVENS stated that it was "36" (\$36,000) and told JACKSON that he had forgotten to tell JACKSON that it was "one off" (\$1,000 short). At approximately 10:15 p.m., TERRELL COVENS, using **COVENS Target Phone**, called KELVIN JACKSON (call session #2484) and told JACKSON that "it" (the money) should be "37" (\$37,000).

i. On or about April 7, 2006, at approximately 3:45 p.m., TERRELL COVENS, using **COVENS Target Phone**, called RONALD TURNER (call session # 2530) and told TURNER

that he had just spoken to JACKSON. TURNER told COVENS that he would meet COVENS at “the Bricks” (The Square). At approximately 4:10 p.m., surveillance observed COVENS’s Tahoe parked in the north parking lot of The Square.

j. At approximately 4:11 p.m., KELVIN JACKSON called TERRELL COVENS on **COVENS Target Phone** (call session # 2539). JACKSON asked if COVENS had gotten in touch with “him” (RONALD TURNER). COVENS said that “he” (TURNER) was on his way, and that COVENS was going to come with TURNER. JACKSON asked COVENS if he remembered where the meet location was at. COVENS said yes.

k. At approximately 4:20 p.m., RONALD TURNER called TERRELL COVENS on **COVENS Target Phone** and asked TURNER if he was going to take “ALMONETTA” (HEMPHILL) with him since it would be better (call session #2542). TURNER told COVENS that he would see if she was “down there” (at The Square) and that TURNER would call COVENS back. At approximately 4:21 p.m., surveillance observed TURNER arrive in his Monte Carlo in the north parking lot of The Square and exited his car. At approximately 4:25 p.m., TURNER called COVENS on **COVENS Target Phone** (call session #2546). TURNER asked COVENS where TURNER was going. COVENS told TURNER the intersection of Lavergne and Fulton in Chicago. COVENS asked TURNER if TURNER remembered the last time they went over there. TURNER confirmed that he did, and that it had been on Fulton. At approximately 4:27 p.m., surveillance observed TURNER and an individual later identified as ALMONETTA HEMPHILL enter TURNER’s Monte Carlo in the north parking lot of The Square. Surveillance followed the Monte Carlo as TURNER drove it away from the area

l. At approximately 4:41 p.m., COVENS, using **COVENS Target Phone**, called KELVIN JACKSON (call session #2555) and told JACKSON that he (COVENS) was not

making the run with TURNER because he had to get “something else” (money) that COVENS had talked to JACKSON about the last time. COVENS then asked JACKSON how much money it was so that he could deliver it to him. JACKSON told COVENS that “it” was “35,500” (TURNER had delivered \$35,500 to JACKSON the previous evening), and that the ending balance was “a quarter” (\$2,500). JACKSON told COVENS that “both of them” (each kilogram of cocaine) was “over” (in excess of one kilogram each).

m. At approximately 4:43 p.m., surveillance observed RONALD TURNER’s Monte Carlo drive on Fulton and park on the south side of the street, just west of Lavergne. At approximately 4:50 p.m., surveillance observed a silver Infiniti bearing Illinois Temporary Registration 251G452 (hereinafter “the Infiniti”)⁸ travel eastbound on Fulton and park next to TURNER’s Monte Carlo. Surveillance saw TURNER get out of the Monte Carlo and enter the passenger side of the Infiniti. At approximately 4:51 p.m., surveillance observed TURNER get out of the Infiniti and get back inside of the Monte Carlo. Both the Infiniti and the Monte Carlo, driven by TURNER, left the area.

n. At approximately 4:59 p.m., law enforcement conducted a traffic stop of TURNER’s Monte Carlo near 3265 W. Warren in Chicago. During the stop, officers identified TURNER as the driver and “ALMONETTA” (HEMPHILL) as the passenger. At the outset of the stop, TURNER informed an officer that he did not have his driver’s license with him. The Officer asked TURNER to step out of the vehicle and began placing handcuff’s on TURNER. As the Officer did so, the Officer noticed that TURNER was holding TURNER’s right arm against the coat that TURNER was wearing as if TURNER was holding something inside of the coat. As TURNER

⁸According to Illinois Secretary of State records, the Infiniti is a 2003 model, VIN JNKCV51E83M000944, registered to Robert Whitfield, 11328 S. Calumet, Chicago, Illinois 60628.

moved his right arm, two brick-shaped packages wrapped in plastic containing a white powdery substance fell to the ground. One of the packages had “1030” written on it, while the other package had “1025” written on its surface. TURNER was placed under arrest, but, in order to preserve the investigation, the Officer released TURNER at the scene a few minutes later. The Officers seized the drugs and left the area at approximately 5:04 p.m.

o. The brick-shaped package with “1030” written on it was found to contain 1119 grams in gross weight of suspected powder cocaine. The brick-shaped package with “1025” written on it was found to contain 1100 grams in gross weight of suspected cocaine.

p. At approximately 5:11 p.m., RONALD TURNER called COVENS on **COVENS Target Phone** (call session #2560) and asked COVENS where he was at. COVENS said he was on Cermak. TURNER asked COVENS to come to “the Bricks” (The Square) “right now” (because the police had just seized 2 kilograms of cocaine from TURNER). At approximately 5:12 p.m., COVENS, using **COVENS Target Phone**, called TURNER (call session #2562) and asked if TURNER if they could meet anywhere else. TURNER asked COVENS where he wanted to meet because he (TURNER) would meet COVENS “right now.” COVENS told TURNER to meet him at the Foot Locker at the mall on Cermak.

B. RONALD TURNER⁹

⁹The identification of RONALD TURNER in this Affidavit is based upon the following: First, the CI has identified RONALD TURNER. Second, law enforcement has been able to identify RONALD TURNER’s voice because that voice has been intercepted on numerous times, particularly on **TURNER Target Phone** and **TURNER Target Phone Two**; because RONALD TURNER was identified or identified himself in many of those calls with the same alias name (“BOO” or “EARL”); and because the voice was consistently associated with the same phone numbers, particularly **TURNER Target Phone** and **TURNER Target Phone Two**. Third, during particular intercepted calls, TURNER arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with TURNER during which TURNER identified himself.

CW/CI Information

31. In February 2006, the CI stated that “BOO” (RONALD TURNER) coordinates the distribution of crack cocaine and crack cocaine proceeds into and out of The Square for TERRELL COVENS.

Non-Title III Information/Seizures

32. On or about November 17, 2005, CPD officers seized crack cocaine from RONALD TURNER and RITA HEMPHILL in HEMPHILL’s apartment in The Square.

a. On November 17, 2005, CPD officers were conducting surveillance at The Square, during which an officer observed SALVATORE BASS, who had delivered a controlled substance to an Undercover Officer (“UCO”) on an earlier date. *See ¶¶227-229.* During a field interview with BASS, the Officer learned that a large quantity of suspect narcotics were being stored inside of building 1830 S. Karlov Avenue, Apartment #101, occupied by an individual named "RITA" (RITA HEMPHILL).

b. CPD officers relocated to HEMPHILL's apartment and knocked on the apartment door. HEMPHILL answered the door, and after a brief conversation with the Officers, permitted them to enter her apartment. HEMPHILL led the Officers into a small bedroom inside of the apartment, opened a freezer, removed a large zip lock bag containing approximately 15 to 16 “jabs” (bags which contain smaller capsules or bags, each of which contain drugs), and gave it to an officer. Subsequent analysis of the capsules indicated that they contained a total of approximately 28.1 grams of cocaine base, in the form of crack cocaine.

c. Shortly after the above-described events, RONALD TURNER came out of another bedroom inside of the apartment, and had a conversation with the two officers. TURNER admitted to the ownership of the suspected crack cocaine, and attempted to make a deal with the

Officers. TURNER offered to provide a high powered rifle to the officers involved in exchange for the return of the suspected crack cocaine.¹⁰ An officer provided TURNER with the number for a CPD undercover cellular telephone, and advised TURNER to contact the Officers if he was able to obtain a weapon in exchange for the return of the seized drugs. The Officers then took the suspect crack cocaine into possession and departed HEMPHILL's apartment.

d. Immediately following the above events, on or about November 17, 2005, approximately five (5) telephone calls were made between an officer and TURNER on **TURNER Target Phone**. In those calls, TURNER told the Officer about his efforts to obtain a firearm for the officers in exchange for the suspect crack cocaine. After making the above-referenced calls, TURNER arrived near a business at Ogden and Pulaski, on the west side of Chicago, where TURNER met with the Officers. While equipped with a body recorder, an officer and TURNER had a lengthy discussion regarding the sale of narcotics within The Square.

e. At this same meeting, TURNER and the Officer argued about the weapon TURNER had in his possession. During the calls preceding the meeting between the Officer and TURNER, TURNER had told the Officer that he would bring him an AK-47 rifle. Instead, TURNER brought a sawed off shotgun which was disassembled in approximately five pieces. TURNER stated that he didn't know what kind of weapon it was. TURNER advised that the last time he had seen the weapon, it was all together. TURNER stated that he stored the weapon at his cousins's residence and that his cousin had taken the shotgun apart. TURNER advised that when he bought the weapon from his friend, it was altogether, he had shot it, and he knew it had worked

¹⁰The Officers told TURNER that if they confiscated firearms from individuals inside of The Square, they would receive additional days off from work. This statement was not true, but was made to TURNER in an effort to make it appear that these officers were "dirty," and willing to engage in illegal conduct.

at one time. The Officer stated that TURNER should know the difference between a AK rifle and a shotgun. TURNER stated that he has gotten a lot of "Techs" (a type of firearm), and that he was familiar with SK's (another type of firearm).

f. The Officer asked TURNER about specific individuals that sell narcotics inside of The Square. TURNER stated that he didn't mess with "TY" (true name known to be Tylon Covens, now deceased). TURNER told the Officer that there were a lot of people that work in The Square selling narcotics, but all TURNER was worried about were the "caps" (small capsules that are filled with crack cocaine). TURNER stated that Tylon Covens had the bags of "batman" (crack cocaine packaged in small bags which had a batman logo on them). TURNER stated that TURNER had "nickel caps" (capsules filled with crack cocaine) and that young girls as well as other individuals sell those capsules in The Square.

g. The Officer asked TURNER who "worked" (sold drugs) with TURNER. TURNER stated that some of the individuals that sold capsules had a tattoo of the word "dirty" on them. TURNER advised that "RELL" (TERRELL COVENS) ran the drug operation, but TERRELL COVENS allowed TURNER to basically run the show. TURNER advised that they (TURNER and TERRELL COVENS) sold narcotics 24 hours a day and that the evening time was the busiest. At the conclusion of the conversation, the Officer stated that he would not return the crack cocaine seized from HEMPHILL's apartment because TURNER had failed to provide the Officer with an AK-47 firearm.

33. On or about January 25, 2006, the Officers had further conversation with TURNER during a traffic stop. During this discussion, an officer further discussed with TURNER his drug trafficking activities. TURNER advised the Officer that he was no longer involved in the drug trafficking business out of fear that he would be a victim of violence in or around The Square.

34. On or about March 16, 2006, CPD officers saw RONALD TURNER near the 1836 S. Karlov building of The Square. CPD officers observed TURNER remove a silver handgun from his person and place it inside of TURNER's Monte Carlo, parked near 1836 S. Karlov. CPD officers placed TURNER under arrest, and searched the Monte Carlo and located a silver, .45 semi-automatic handgun loaded with five rounds of .45 ammunition. TURNER was released from custody on approximately March 18, 2006.

Title III Calls/Seizures

35. During the investigation, criminally pertinent conversations were intercepted between co-conspirators discussing RONALD TURNER's involvement in the drug operation in The Square. For instance, on or about March 19, 2006, at approximately 11:33 p.m., TERRELL COVENS, using **COVENS Target Phone**, called LAMONT HARRIS (call session #1052). During the call, COVENS asked for "FRO" (LAMONT HARRIS). COVENS asked HARRIS if he was "cool" (based on my training and experience, and my involvement in the investigation, I believe COVENS was asking HARRIS about HARRIS's narcotics supply). HARRIS asked COVENS who was on the phone. COVENS responded "RELLO" (TERRELL COVENS). HARRIS stated "yes, I'm decent [meaning HARRIS's supply of narcotics was okay], BOO [RONALD TURNER] just slid on me [provided HARRIS with narcotics] not too long ago." COVENS asked if RONALD TURNER had "spent off" (went away)? HARRIS said yes. COVENS asked "what it [narcotics] look like?" HARRIS said "shit, I'm on my second one [second quantity of narcotics] now." COVENS asked who was out there (in The Square selling narcotics). HARRIS said "SHAUN [believed to be SHAUN JAMES], HERB [believed to be HERBERT ROBINSON] and [another individual]." COVENS told HARRIS that he (COVENS) would "slide back over there" (to the Square) in a minute. HARRIS said "alright."

36. During the investigation, criminally pertinent calls were intercepted in which RONALD TURNER discussed his involvement in the drug operation in The Square with other co-conspirators:

a. On or about February 16, 2006 and February 17, 2006, RONALD TURNER, using **TURNER Target Phone**, had a series of conversations with TERRELL COVENS, using **COVENS Target Phone**, regarding TURNER cutting, cooking, or packaging narcotics, and distributing those narcotics in The Square. *See* ¶¶28a-c.

b. On or about March 26, 2006, at approximately 3:29 p.m., RONALD TURNER, using **TURNER Target Phone**, called TERRELL COVENS on **COVENS Target Phone** (call session #1443). TURNER asked if COVENS could give him what he “did” last night (either narcotics or money representing the sale of narcotics). TURNER said that he had to go to the “crib” (street term for residence) and get “it” (narcotics and/or money). TURNER said that he had “put it [narcotics or money] up” when he went to the “crib” (residence). TURNER said regarding his money, that he had “seven, yeah I got six” (TURNER had approximately \$600 to \$700). TURNER told COVENS that TURNER could give COVENS what TURNER “did [with respect to the sale of narcotics or money representing the sale of narcotics] last night and that six (\$600)?” COVENS said “alright.”

37. On or about April 6, 2006, RONALD TURNER and TERRELL COVENS made partial payment to KELVIN JACKSON for 2 kilograms of cocaine. On or about April 7, 2006, KELVIN JACKSON distributed the 2 kilograms of cocaine to TERRELL COVENS through RONALD TURNER and ALMONETTA HEMPHILL. Law enforcement subsequently seized the 2 kilograms of cocaine from RONALD TURNER. *See* ¶30.

C. TREVEL COVENS¹¹

CW/CI Information

38. In February 2006, the CI advised law enforcement that TREVEL COVENS distributed “blows” (a street term for heroin) in The Square. According to the CI, TREVEL COVENS uses two individuals, KENYATI JORDAN and Individual B, as runners distributing \$10 to \$20 bags of heroin to shift supervisors in The Square. The CI identified TREVEL COVENS’s workers to include SHALONDA BROWN and SAM HARRIS. The CI stated that TREVEL COVENS packages his “blows” (heroin) by placing the heroin inside of aluminum foil and sealing them with blue or black colored duct tape, or placing the packets inside of a zip lock bag.

Non-Title III Information/Seizures

39. On or about May 12, 2005, SHALONDA BROWN told FBI agents that TREVEL COVENS is responsible for distributing crack cocaine inside of The Square.

40. On or about June 30, 2005, CPD officers, in their role as ruse officers, obtained three handguns from TREVEL COVENS. COVENS advised law enforcement that members of the NEW BREEDS gang were keeping their guns in one of the apartments at 3334 W. Douglas Avenue in Chicago. Officers drove COVENS to within two blocks of 3334 W. Douglas Avenue. COVENS exited the car, and returned shortly thereafter with the following firearms: 1) MP-25 .25 caliber

¹¹The identification of TREVEL COVENS in this Affidavit is based upon the following: First, the CI identified TREVEL COVENS. Second, law enforcement has been able to identify TREVEL COVENS’s voice because that voice has been intercepted on numerous times, particularly on **COVENS Target Phone**; because TREVEL COVENS was identified or identified himself in many of those calls with the same alias name (“MOOK” or “MDOT”); and because the voice was consistently associated with the same phone number(s). Third, during particular intercepted calls, TREVEL COVENS arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with TREVEL COVENS during which TREVEL COVENS identified himself.

Raven Arms firearm; 2) Bryco 58 .380 caliber Jennings firearm; and 3) Long CTC .32 caliber Smith & Wesson firearm. COVENS told the officers that if they needed any additional guns, COVENS could provide them with five guns per day.

Title III Calls/Seizures

41. On or about March 19, 2006 at approximately 10:04 p.m., TERRELL COVENS, using **COVENS Target Phone**, called TREVEL COVENS (call session #1037). TERRELL COVENS and TREVEL COVENS discussed the police presence in The Square. TERRELL COVENS asked TREVEL COVENS if he could have someone get “it” (narcotics or money) to TERRELL COVENS. TREVEL COVENS replied that it was currently the only “rotation” (the narcotics shift in The Square for the drug operation to make money).

42. On or about March 31, 2006, at approximately 5:30 p.m., TREVEL COVENS called TERRELL COVENS on **COVENS Target Phone** (call session #1804). TREVEL COVENS told TERRELL COVENS that this is about those “Camels” (street term for firearms) and that the guy he was talking to said he was ready to sell the firearms to TERRELL COVENS and TREVEL COVENS. TREVEL COVENS advised that he wanted to talk to TERRELL COVENS later about what the seller of firearms said.

43. On or about April 4, 2006, CPD officers seized an undetermined amount of heroin and two firearms in The Square in an incident involving TREVEL COVENS, TERRY COVENS, Individual N, RODNEY WILLET, and LEVELL HICKS. TREVEL COVENS and TERRELL COVENS subsequently discussed the seizure of one of the firearms on or about April 5, 2006.

a. On or about April 4, 2006, CPD officers received a telephone call from the CI, who advised that TREVEL COVENS, TERRY COVENS, Individual N, RODNEY WILLET, and others were selling narcotics inside of the 1836 S. Karlov building of The Square. When

officers, role-playing as corrupt police officers, walked toward the 1836 building, they observed TREVEL COVENS, TERRY COVENS, Individual N, RODNEY WILLETT and others near the building. The officers then saw TERRY COVENS and Individual N walk inside of the 1836 building, and quickly walk back outside. The officers entered the building and located heroin and a .357 revolver inside of the common space of the building. Upon exiting the building, the officers had a recorded conversation with TREVEL COVENS in which TREVEL COVENS offered to give the officers firearms in exchange for the officers' agreement to not arrest him or the others. While in the officers' presence, TREVEL COVENS made a series of phone calls to "VELL" (LEVELL HICKS). After these conversations, TREVEL COVENS stated that HICKS would drop a gun off to the officers in the north parking lot of The Square. Officers subsequently recovered a .30 caliber rifle from HICKS in the north parking lot of The Square.

b. While with CPD officers on April 4, 2006, TREVEL COVENS told the officers that Individual C, a rival gang member, was trying to recruit people and take over the drug operation in The Square. TREVEL COVENS advised that both the people from The Square and Individual C's people had been shooting at each other.

c. On or about April 5, 2006, at approximately 6:44 p.m., TERRELL COVENS, using **COVENS Target Phone**, called TREVEL COVENS (call session #2372). TERRELL COVENS told TREVEL COVENS not to give the officers anything else, unless it is TREVEL or "BOO" (RONALD TURNER) that gets caught. TERRELL COVENS told TREVEL COVENS that if anyone else gets caught, TERRELL COVENS "ain't giving them shit [firearms or other items to secure their release from custody of the "ruse" officers]" and would let those people go to jail. TERRELL COVENS told TREVEL COVENS that every time something negative happens in The Square, TERRELL COVENS takes the loss. TERRELL COVENS told TREVEL COVENS again

to stay away from the “ruse” officers and instructed TREVEL COVENS to not give the officers anything else. TERRELL COVENS told TREVEL COVENS that TREVEL should call “LORD” (JEFFREY BOWEN) because they needed additional firearms now.

44. On or about April 21, 2006, at approximately 4:55 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called MARCELL BREWSTER (call session #107) and related a conversation RANDALL BREWSTER had with KENDALL BREWSTER regarding TREVEL COVENS’s sale of narcotics in The Square. According to RANDALL BREWSTER, “MOOK” (TREVEL COVENS) had put “a couple of jabs [bags containing smaller bags of narcotics] out there [in The Square].” According to RANDALL BREWSTER, TREVEL COVENS permitted KENDALL BREWSTER to throw “two jabs out there [in The Square]” as soon as TREVEL COVENS finished selling. According to RANDALL BREWSTER, KENDALL BREWSTER had “had almost finished [selling] the shit [narcotics].”

D. LAVELL COVENS¹²

CW/CI Information

45. In February 2006, the CI advised law enforcement that LAVELL COVENS distributes “sawbucks” (\$10 bags) of crack cocaine in The Square. The CI explained that LAVELL COVENS will drop off crack cocaine to “runners” who distribute crack cocaine to shift supervisors

¹²The identification of LAVELL COVENS in this Affidavit is based upon the following: First, the CI has identified LAVELL COVENS. Second, law enforcement has been able to identify LAVELL COVENS’s voice because that voice has been intercepted on numerous times, particularly on **COVENS Target Phone**; because LAVELL COVENS was identified or identified himself in many of those calls with the same alias name (“BAY BAY” or “STYLES”); and because the voice was consistently associated with the same phone number(s). Third, during particular intercepted calls, LAVELL COVENS arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with LAVELL COVENS during which LAVELL COVENS has identified himself as LAVELL COVENS.

in The Square. According to the CI, sometimes LAVELL COVENS will provide the “runners” with ounces of crack cocaine to “bag up” (package) into smaller packages for street sale. On other occasions, LAVELL COVENS will give the “runners” “packs” (smaller bags) of crack cocaine, which have already been packaged for street sale. The CI identified Individual Q, LAMONT HARRIS, and SAMUEL HARRIS as individuals who “bag up” (package narcotics) narcotics for LAVELL COVENS.

Title III Calls/Seizures

46. On or about March 18, 2006, LAVELL COVENS spoke to TERRELL COVENS regarding drug sales in The Square.

a. At approximately 6:06 p.m., LAVELL COVENS called TERRELL COVENS on **COVENS Target Phone** (call session# 943). LAVELL COVENS asked TERRELL COVENS “what just happened?” TERRELL COVENS said “remember I told you, I need that [narcotics].” TERRELL COVENS told LAVELL COVENS to just get “it” (narcotics) to him tomorrow. LAVELL COVENS replied “I still have 4 and a half [certain quantity] of those [narcotics] left.” LAVELL COVENS told TERRELL COVENS “alright”, and that he would get “it” (narcotics) to TERRELL COVENS the next day.

b. At approximately 8:14 p.m., TERRELL COVENS, using **COVENS Target Phone**, called LAVELL COVENS (call session #1026) and asked “where they [workers in The Square] at?” LAVELL COVENS told TERRELL COVENS that the workers were “in rotation” (working a narcotics shift in The Square). At approximately 9:55 p.m., TERRELL COVENS, using **COVENS Target Phone**, called LAVELL COVENS (call session #1036). TERRELL COVENS asked LAVELL COVENS if he was in “the Bricks” (The Square). LAVELL COVENS replied that he was, and that he was waiting on “MAC” (TION NEWTON). TERRELL COVENS advised that

there were three or four cars (believed to be cars containing law enforcement or members of a rival gang) driving up "18" (18th Street) and driving through the alleys. LAVELL COVENS told TERRELL COVENS that he would "watch it" (look for the cars). TERRELL COVENS told LAVELL COVENS to let him know. LAVELL COVENS stated that he was "on point" (doing security for the drug operation in The Square).

47. Or about March 30, 2006, at approximately 4:03 p.m., TERRELL COVENS, using **COVENS Target Phone**, called LAVELL COVENS (call session #1665). TERRELL COVENS asked LAVELL COVENS if he had the "shift" (selling of narcotics in The Square). LAVELL replied yes, and that he was pulling up in The Square right now.

48. Or about April 3, 2006, at approximately 8:35 p.m. TERRELL COVENS, using **COVENS Target Phone**, called LAVELL COVENS (call session #2197). TERRELL COVENS asked LAVELL COVENS if he had that "7" (quantity of narcotics or narcotics proceeds) for him. LAVELL COVENS asked TERRELL COVENS if he needed "it" (narcotics or narcotics proceeds). TERRELL COVENS stated that he did need it. LAVELL COVENS advised that he would be back with it.

49. On or about April 4, 2006, at approximately 11:37 p.m., LAVELL COVENS called TERRELL COVENS on **COVENS Target Phone** (call session #2317). LAVELL COVENS told TERRELL COVENS that he was trying to "catch" (injure or kill) Individual C, a rival gang member that is believed to have killed Tylon Covens). LAVELL COVENS stated that he "tried to catch his ass", but "missed him" (with a bullet) by two inches.

SUPPLIERS

E. KELVIN JACKSON¹³

50. As set forth above, KELVIN JACKSON is a supplier of firearms and narcotics to TERRELL COVENS and the drug operation in The Square.

a. On or about March 12, 2006, KELVIN JACKSON had a series of conversations with TERRELL COVENS regarding JACKSON's sale of approximately two kilograms of cocaine to COVENS for approximately \$41,000. *See* ¶29a.

b. On or about March 26, 2006, KELVIN JACKSON spoke to TERRELL COVENS regarding JACKSON's ability to supply TERRELL COVENS with firearms. *See* ¶29b.

c. On or about April 6, 2006, RONALD TURNER and TERRELL COVENS made partial payment to KELVIN JACKSON for 2 kilograms of cocaine. On or about April 7, 2006, KELVIN JACKSON distributed the 2 kilograms of cocaine to TERRELL COVENS through RONALD TURNER and ALMONETTA HEMPHILL. Law enforcement subsequently seized the 2 kilograms of cocaine from RONALD TURNER. *See* ¶30.

F. RANDALL BREWSTER¹⁴

¹³The identification of KELVIN JACKSON in this Affidavit is based on the following: First, law enforcement has been able to identify KELVIN JACKSON's voice because that voice has been intercepted on numerous times, particularly on **COVENS Target Phone**; because KELVIN JACKSON was identified or identified himself in many of those calls with the same alias name ("CAMIO" or "OSKI"); and because the voice was consistently associated with the same phone number(s), particularly **JACKSON Target Phone**. Second, during particular intercepted calls, KELVIN JACKSON arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement.

¹⁴The identification of RANDALL BREWSTER in this Affidavit is based on the following: First, law enforcement has been able to identify RANDALL BREWSTER's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One** and **BREWSTER Target Phone**; because RANDALL BREWSTER was identified or identified himself in many of those calls with the same alias name ("RANDY") and because the voice was consistently associated

Title III Calls/Seizures

51. On or about January 22, 2006, at approximately 1:16 p.m., RANDALL BREWSTER, called MARCUS BROWN on **Target Phone One** (call session #4296) and had a discussion with MARCUS BROWN and other co-conspirators regarding drug sales in The Square.

a. At the outset of the call, RANDALL BREWSTER asked MARCUS BROWN if KENDALL BREWSTER was with him. MARCUS BROWN confirmed that he was and RANDALL BREWSTER asked him where they were. MARCUS BROWN stated that they were in the "V" (The Village¹⁵) and that Individual D was there.

b. Individual D then got on the phone to speak with RANDALL BREWSTER. Individual D asked RANDALL BREWSTER if he wanted to “put the band back together” (start selling drugs together again) because Individual D felt that they were on the same “demo” (engaging in the same conduct). Individual D said that he was over on Washburn (a street in Chicago), but it was “too hot” (there was significant police presence), so he was trying to “do something” (sell drugs) over in the Village. Individual D said that he had heard that RANDALL BREWSTER had the “see through” thing (capsules containing crack cocaine) again. RANDALL BREWSTER denied this and said that he was just doing the “weed shit” (selling marijuana). Individual D did not believe him and questioned him. RANDALL BREWSTER said that he did not want to deal with that “shit” (crack cocaine). Individual D told RANDALL BREWSTER that he was only talking about “a half” (of a kilogram of cocaine) or something, so he could build his shit up (JACKSON’s drug business)

with the same phone numbers, including **BREWSTER Target Phone**. Second, during particular intercepted calls, RANDALL BREWSTER arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement.

¹⁵The Village refers to Section 8 housing located near Ashland and Roosevelt in Chicago. Members of the New Breeds gang have a presence in The Village.

from there. Individual D then told RANDALL BREWSTER that he used to give him “nines” (9 ounces of cocaine) and that RANDALL BREWSTER was the one who started him the last time so he could “build something” (his drug business) from nothing.

c. After continued talk with Individual D, KENDALL BREWSTER got on the phone to talk with RANDALL BREWSTER. During the conversation, KENDALL BREWSTER asked RANDALL BREWSTER if he was going to do something with JACKSON. RANDALL BREWSTER replied “hell no the motherfucker [Individual D] is crazy.” RANDALL BREWSTER told KENDALL BREWSTER that a lot of guys do not know how to “cook like that” (cook powdered cocaine into crack cocaine), which, he said, was how “they” (RANDALL BREWSTER and others) made all that money from the guys in The Square last time. RANDALL BREWSTER then said that he was ready to “do it” (sell drugs in The Square) again, and that all they (RANDALL BREWSTER and others) would have to do is drop “it” (crack cocaine) off and do a “pass out” (give away bags of crack cocaine for free), and then everybody would see that “they” (he and KENDALL BREWSTER) had the “best shit” (crack cocaine).

52. On or about February 18, 2006, RANDALL BREWSTER, via KENDALL BREWSTER, supplied MARCUS BROWN with crack cocaine, which MARCUS BROWN distributed to JEFFREY BOWEN and OASIS COBBIN. Law enforcement subsequently seized approximately 27.7 grams of crack cocaine and approximately \$327 from JEFFREY BOWEN and OASIS COBBIN.

a. Between approximately 11:23 a.m. and 2:14 p.m., MARCUS BROWN, using **Target Phone One** talked to KENDALL BREWSTER (call sessions ##9585 and 9623). During the calls, BROWN told KENDALL BREWSTER that two people (JEFFREY BOWEN and OASIS COBBIN) were going to buy “probably a half and a fourth, or a half and an eight ball” (½ and 1/4

of an ounce of crack cocaine, or ½ and 1/8 of an ounce of crack cocaine). KENDALL BREWSTER told BROWN that he would contact “RANDY” (RANDALL BREWSTER) in order to obtain the crack cocaine. At 2:14 p.m., BROWN told KENDALL BREWSTER that his “guy and them” (BOWEN and COBBIN) were there. KENDALL BREWSTER told BROWN that he would be there in ten minutes.

b. At approximately 3:10 p.m., law enforcement conducted a traffic stop of JEFFREY BOWEN and OAIS COBBIN. Law enforcement seized \$187 and one plastic bag from JEFFREY BOWEN containing a substance believed to be crack cocaine. The substance was later tested and found to be approximately 10.4 grams of mixtures containing cocaine base, in the form of crack cocaine. Law enforcement seized \$140 and one plastic bag containing a substance believed to be crack cocaine from OAIS COBBIN. The substance was later tested and found to be approximately 17.3 net grams of mixtures containing cocaine base, in the form of crack cocaine.

c. At approximately 3:17 p.m., JEFFREY BOWEN called MARCUS BROWN on **Target Phone One** (call session #9629). BOWEN complained to BROWN that police officers had pulled him over at Central Park and 16th Street because the officers believed that BOWEN was in possession of contraband. BOWEN told BROWN that the officers, one of whom he identified as a “Chinese motherfucker” (one of the ruse officers) had seized crack cocaine and money from them, and then drove away. BROWN asked if BOWEN’s “cousin” (OAIS COBBIN) had been arrested. BOWEN told BROWN that he had not.

d. At approximately 3:23 p.m., MARCUS BROWN, using **Target Phone One**, called JEFFREY BOWEN (call session #9631). BOWEN told BROWN that he (BOWEN) was “stuck” (without narcotics). BROWN asked how much BOWEN could give BROWN for an ounce of crack cocaine. BOWEN told BROWN that BOWEN could double the amount. BROWN asked

BOWEN how much money the police had taken. BOWEN responded that the police had taken \$180 from him and “all that shit” (the 27.7 grams of crack cocaine seized from BOWEN and COBBIN). BROWN told BOWEN to come and pick up the ounce of crack cocaine..

53. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others.

a. On March 2, 2006, MARCUS BROWN contacted KENDALL BREWSTER in an effort to broker a crack cocaine transaction with JOHNEAK JOHNSON’s customer, Individual E. KENDALL BREWSTER drove a gold Chevy Malibu (hereinafter the “Malibu”), in which MARCUS BROWN and TERRANCE BREWSTER rode as passengers, to the location of the transaction – the parking lot located at the intersection of Homan and Roosevelt. Surveillance observed MARCUS BROWN exit the Malibu and enter the vehicle in which Individual E was sitting. Officers approached the gold Chevy Malibu and observed KENDALL BREWSTER sitting in the front driver’s seat, and TERRENCE BREWSTER sitting in the rear passenger seat. As officers did so, they observed KENDALL BREWSTER toss from his left hand a clear knotted plastic bag containing a large white rock-like substance believed to be crack cocaine onto the front passenger seat. Subsequent analysis of the substance inside of the bag identified it as approximately 13.7 grams (approximately one-half ounce) of mixtures containing cocaine base, in the form of crack cocaine.

b. Following the officers’ discovery, CPD officers, their role as ruse officers, had a consensually recorded conversation with KENDALL BREWSTER, TERRANCE BREWSTER, and BROWN. The officers explained that because the crack cocaine was found inside

the vehicle in which the KENDALL BREWSTER, TERRANCE BREWSTER, and BROWN had sat, all of them would be placed under arrest. KENDALL BREWSTER, TERRANCE BREWSTER, and MARCUS BROWN agreed to provide the Officers with a total of two firearms in exchange for their release. The Officers kept KENDALL BREWSTER, TERRANCE BREWSTER, and MARCUS BROWN at the scene for a period of time. After that period of time, officers permitted MARCUS BROWN and TERRANCE BREWSTER to leave the area in the Malibu in order to obtain the firearms.

c. At approximately 11:34 a.m., KENDALL BREWSTER, using **Target Phone One**, called JOHNEAK JOHNSON (call session #11960). KENDALL BREWSTER told JOHNSON that he was in the back seat of a car with “Steve and Mugsy” (nicknames used by co-conspirators for two of the ruse officers). KENDALL BREWSTER explained to JOHNSON that the officers wanted “two things” (two firearms) in exchange for letting KENDALL BREWSTER, TERRANCE BREWSTER, and BROWN, out of custody. Later, during the same call, BROWN took the phone and spoke to JOHNSON, who agreed to help them get some firearms.

d. At approximately 11:45 a.m. and 11:51 a.m., KENDALL BREWSTER made two calls using **Target Phone One** (call sessions ##11965 and 11971) in an attempt to locate RANDALL BREWSTER so that RANDALL BREWSTER could provide KENDALL BREWSTER with two firearms.

e. At approximately 11:53 a.m., TERRANCE BREWSTER, using **Target Phone One**, called Individual F (call session #11972). TERRANCE BREWSTER told Individual F, who identified himself during the call as Individual F, to go to “RANDY’s [RANDALL BREWSTER’s] house,” and that it was important.

f. At approximately 11: 55 a.m., TERRANCE BREWSTER, using **Target Phone One**, called RANDALL BREWSTER (call session #11974). During the call, TERRANCE BREWSTER told RANDALL BREWSTER that Individual F was going to come to RANDALL BREWSTER's house.

g. At approximately 11:56 a.m., KENDALL BREWSTER, using **Target Phone One**, called RANDALL BREWSTER (call session #11975). KENDALL BREWSTER asked RANDALL BREWSTER if he had a "nine" (9mm firearm). RANDALL BREWSTER asked if the officers wanted a "big one [firearm] like that [a 9mm]?" KENDALL BREWSTER replied "yes." RANDALL BREWSTER said that he would get the Officers what they wanted.

h. At approximately 12:04 p.m., MARCUS BROWN, using **Target Phone One**, called JOHNEAK JOHNSON (call session #11978). JOHNSON told BROWN that he (JOHNSON) was trying to get BROWN a firearm. BROWN told JOHNSON that he (BROWN) was sending out there to him (to JOHNSON's location). BROWN told JOHNSON that RANDALL BREWSTER just brought KENDALL BREWSTER a "45" (.45 caliber firearm). JOHNSON reassured BROWN that "Black Gangster [street gang with which BROWN is affiliated] ain't going to leave you hanging." JOHNSON told BROWN that JOHNSON's cousin (RANDALL BREWSTER) would get the firearm for BROWN.

i. At approximately 12:12 p.m., MARCUS BROWN, using **Target Phone One**, called JOHNEAK JOHNSON (call session #11984). JOHNSON told BROWN that he (JOHNSON) had told "them" (the people from whom JOHNSON was getting the gun) what to do. BROWN told JOHNSON to have JOHNSON's people to drop "it" (the firearm) off in the parking lot where the officers were detaining BROWN, KENDALL BREWSTER, and TERRANCE BREWSTER.

j. On or about 12:16 p.m., RANDALL BREWSTER called MARCUS BROWN on **Target Phone One** (call session #11985). BROWN told RANDALL BREWSTER that the Officers were going to let him (BROWN), “KEN KEN” (KENDALL BREWSTER) and “TERRY” (TERRANCE BREWSTER) go if they got two “thumpers” (firearms). BROWN told RANDALL BREWSTER that JOHNEAK JOHNSON was bringing a “38” (.38 caliber firearm). RANDALL BREWSTER told BROWN that “dude is on the way with the motherfucker [the other firearm].”

k. Between approximately 12:14 p.m. and approximately 12:47 p.m., MARCUS BROWN, using **Target Phone One**, had a series of conversations with JOHNEAK JOHNSON (call sessions ## 11987, 11988, 11992, 12006, and 12009) regarding JOHNSON’s efforts to locate a firearm for BROWN.

l. At approximately 12:46 p.m., KENDALL BREWSTER, using **Target Phone One**, called MARCELL BREWSTER (call session # 12008). KENDALL BREWSTER told MARCELL BREWSTER to come to the north parking lot of The Square.

m. At approximately 12:56 p.m., MARCUS BROWN, using **Target Phone One**, called JOHNEAK JOHNSON (call session #12009). BROWN asked JOHNSON where the firearm was located. JOHNSON replied that the gun was at “1247” (S. Spaulding). After the call, surveillance observed BROWN and TERRANCE BREWSTER get into the Malibu and travel toward 1247 S. Spaulding.

n. At approximately 12:57 p.m., MARCELL BREWSTER called TERRANCE BREWSTER on **Target Phone One** (call session #12014) agreed to meet by the Polish hotdog stand near Independence Avenue and the 290 Expressway (hereinafter “the hotdog stand”).

o. At approximately 1:00 p.m., surveillance observed BROWN and TERRANCE BREWSTER in the area of 1247 S. Spaulding in the Malibu. BROWN exited the Malibu and talked

to an unidentified black male (hereinafter “UM”). Surveillance then saw BROWN reenter the Malibu and drive into an alley, where the UM approached the Malibu. Surveillance next saw BROWN drive away from the area. At approximately 1:02 p.m., MARCUS BROWN, using **Target Phone One**, called KENDALL BREWSTER (call session #12016). BROWN told KENDALL BREWSTER that he had the “.38” (.38 caliber firearm) and was on his way to grab “the other” (firearm) by the hotdog stand. BROWN told BREWSTER that BROWN would come back with both firearms.

p. Between approximately 1:05 p.m. and 1:08 p.m., MARCUS BROWN (call session #12017) and TERRANCE BREWSTER (call sessions ##12019 and 12020) had conversations with MARCELL BREWSTER regarding MARCELL BREWSTER’s location with respect to the hot dog stand. At approximately 1:10 p.m., surveillance observed BROWN and TERRANCE BREWSTER inside of the Malibu at the hotdog stand. Also present was a red Dodge with a black roof (hereinafter “the Dodge”), parked next to the vehicle in which BROWN and TERRANCE BREWSTER were sitting. Surveillance observed MARCELL BREWSTER exit the passenger seat of the Dodge, and walk over to the driver’s side of the vehicle in which BROWN and TERRANCE BREWSTER were sitting. Surveillance then observed TERRANCE BREWSTER exit the Malibu and walk, with MARCELL BREWSTER to the Dodge, which they entered. Surveillance saw the Dodge and the Malibu then depart the area.

q. At approximately 1:10 p.m., MARCUS BROWN, using **Target Phone One**, called one of the CPD officers (call session #12023) who had detained him earlier that day. BROWN told the Officer that he (BROWN) was on “his way” (to the north parking lot of The Square). BROWN told the Officer he had “both of them” (both firearms).

r. At approximately 1:15 p.m., surveillance observed BROWN return to the north parking lot of The Square, where BROWN met with the CPD officers. During the meeting, BROWN provided the officers with the following items: 1) one .38 Smith & Wesson firearm; 2) one Luger 9mm, Model C9 firearm. At approximately 1:20 p.m., RANDALL BREWSTER called MARCUS BROWN on **Target Phone One** (call session#12024). RANDALL BREWSTER asked BROWN if BROWN was “cool” (if BROWN had provided the officers with the firearms). RANDALL BREWSTER then asked BROWN if the officers were looking at BROWN’s phone. BROWN said “no.” The Officers released KENDALL BREWSTER and MARCUS BROWN.

s. At approximately 1:44 p.m., surveillance conducted a traffic stop of the Dodge, which it had followed since seeing the Dodge depart the hot dog stand. During the stop, officers identified the driver as Individual F, and the passengers as TERRANCE BREWSTER and MARCELL BREWSTER. The Officers did not detain the occupants of the Dodge.

54. In late April 2006, RANDALL BREWSTER had conversations on **BREWSTER Target Phone** with KENDALL BREWSTER and MARCELL BREWSTER regarding the cutting, packaging, and sale of heroin. For instance:

a. On or about April 21, 2006, at approximately 4:16 p.m., KENDALL BREWSTER called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #83). During the call, KENDALL BREWSTER said “as far as that other thing,” he still had 2 jabs [2 bags containing smaller bags of narcotics] out there [in The Square].” KENDALL BREWSTER asked RANDALL BREWSTER if he was “gonna get some more up” (get more drugs in The Square). RANDALL BREWSTER said “yeah . . . probably some China white [heroin], it’s gonna be better.”

b. At approximately 7:28 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called MARCELL BREWSTER (call session #172). RANDALL BREWSTER told

MARCELL BREWSTER that he has to “coach” MARCELL BREWSTER “through it” (through the process of cutting heroin with agents such as Sleepinol or Dormin). RANDALL BREWSTER asked MARCELL BREWSTER “how many pills” (of cutting agents) does he put “on a gram” (of heroin). MARCELL BREWSTER said “eight” (pills of cutting agents), and asked RANDALL BREWSTER if he was going to sell “two grams” (of heroin). RANDALL BREWSTER said “yeah, they [BREWSTER’s salespeople] sold out.” MARCELL BREWSTER asked RANDALL BREWSTER if he had “aluminum foil”(commonly used to package heroin). RANDALL BREWSTER responded that “we had some the last time.” MARCELL BREWSTER and RANDALL BREWSTER then discussed how to mix the cutting agents with the heroin. RANDALL BREWSTER said “we need pills [of cutting agents] don’t we?” MARCELL BREWSTER said “yeah, we ain’t got none.”

c. At approximately 7:30 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called MARCELL BREWSTER (call session #173). RANDALL BREWSTER asked MARCELL BREWSTER “how many pills [of a cutting agent] in a pack?” MARCELL BREWSTER said “32.” MARCELL BREWSTER and RANDALL BREWSTER discussed how to mix the cutting agents with the heroin. MARCELL BREWSTER explained “put the pills [of a cutting agent] through the strainer about 4 times, put the dope [heroin] through the strainer about 4 times separately, then you put it [the heroin and the cutting agent] through the strainer about 3 times and then you put it [the heroin and the cutting agent] in the blender. Have TERRY [TERRANCE BREWSTER] cut up the aluminum foil [packaging for the heroin].” RANDALL BREWSTER said that he was going to go to the store right away.

d. At approximately 8:15 p.m., KENDALL BREWSTER called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #190). RANDALL BREWSTER said that he was driving “all over the city trying to get Sleepinol [a common cutting agent for heroin].”

RANDALL BREWSTER explained that “this is the fourth Walgreen’s [drug store] that didn’t have it [Sleepinol].” KENDALL BREWSTER asked if “they [Walgreen’s] don’t have any Dors [believed to be Dormin, another common cutting agent for heroin] either.” RANDALL BREWSTER said no.

e. At approximately 8:57 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called MARCELL BREWSTER (call session #229). RANDALL BREWSTER asked MARCELL BREWSTER if they could “use a regular roll of [aluminum] foil” (to package the heroin). MARCELL BREWSTER asked if “there’s any [foil] left?” RANDALL BREWSTER said no, “TERRY [TERRANCE BREWSTER] brought it all up.” RANDALL BREWSTER and MARCELL BREWSTER discussed TERRANCE BREWSTER’s location in a house in which their mother is located. MARCELL BREWSTER instructed RANDALL BREWSTER to “make the squares [of aluminum foil in which the heroin will be placed] real big and you can fold them up two or three times.”

55. On or about May 3 and 4, 2006, RANDALL BREWSTER, using **BREWSTER Target Phone**, had a series of conversations with KENDALL BREWSTER, TERRELL COVENS, and others regarding his sale of crack cocaine to TERRELL COVENS and the drug operation in The Square.

a. On or about May 3, 2006, at approximately 7:53 p.m., RANDALL BREWSTER had a conversation with an unknown male (“UM”) (call session #3346) in which BREWSTER stated that he was leaving The Square. He further stated that he had just met with “MOOK” (TREVEL COVENS) and “RELLO” (TERRELL COVENS) on the “defense” (heroin) and the “c” (cocaine), and that “they (TREVEL and TERRELL COVENS) are going to buy “a whole thing” (one quantity of narcotics). BREWSTER explained that “they” (TREVEL and TERRELL COVENS) gave him the money for the narcotics first. BREWSTER said that “they want

it [crack cocaine] cooked too.” BREWSTER reasoned that TREVIL and TERRELL COVENS “can’t cook” (the cocaine into crack cocaine themselves), so that is why they want BREWSTER to “chef” (cook) everything.

b. At approximately 9:30 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called KENDALL BREWSTER (call session #3366). RANDALL BREWSTER asked KENDALL BREWSTER if “RELLO” (TERRELL COVENS) wants “it” (the crack cocaine) for sure. KENDALL BREWSTER said “yes,” that COVENS wanted it early in the morning, around 5 or 6 a.m. RANDALL BREWSTER said that he would have “it [the crack cocaine] ready.”

c. On or about May 4, 2006, at approximately 8:26 a.m., TERRELL COVENS called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #3473). COVENS asked BREWSTER if he was “almost there” (to The Square). BREWSTER said “no, actually I’m letting it [crack cocaine] dry.” COVENS asked “what?” BREWSTER said “I am letting it dry, you want me to do it for you, right?” COVENS responded “yeah.” BREWSTER said that he was “letting it dry for a little,” because he didn’t want “to bring it [the crack cocaine] wet.” COVENS said “alright.”

G. KENDALL BREWSTER¹⁶

Title III Calls/Seizures

¹⁶The identification of KENDALL BREWSTER is based on the following: First, law enforcement has been able to identify KENDALL BREWSTER’s voice because that voice has been intercepted numerous times, particularly on **Target Phone One** and **BREWSTER Target Phone**; because KENDALL BREWSTER was identified or identified in many of those calls with the same alias name (“KEN KEN”) and because the voice was consistently associated with the same phone number(s). Second, during particular intercepted calls, KENDALL BREWSTER arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with KENDALL BREWSTER during which KENDALL BREWSTER has identified himself.

56. On or about December 8, 2005, at approximately 4:27 p.m., MARCUS BROWN, using **Target Phone One**, called KENDALL BREWSTER (call session #540). BROWN asked KENDALL BREWSTER if he had “some jabs bagged up” (jabs are smaller bags containing narcotics, usually heroin or crack cocaine, which are all contained in a larger bag). KENDALL BREWSTER replied that he did, and would get the jabs ready for BROWN.

57. On or about February 12, 2006, MARCUS BROWN, using **Target Phone One**, had a series of conversations with KENDALL BREWSTER and JOHNEAK JOHNSON regarding drug sales in The Square.

a. At approximately 1:58 p.m., BROWN, using **Target Phone One**, called KENDALL BREWSTER (call session #8438). BROWN told BREWSTER that “PEPE” (JOHNEAK JOHNSON) was going to “run off” (sell) the “eight ball and quarter” (believed to be one-eighth of an ounce and one-quarter of an ounce of powder or crack cocaine) and would give him (BREWSTER) “everything” (all of the money from the sale of the narcotics). BREWSTER accused BROWN of selling drugs without BREWSTER’s knowledge. BREWSTER told BROWN if he was doing so, BREWSTER would come “over there” (to where BROWN was at), and beat “the fuck” out of them (BROWN and JOHNSON).

b. At approximately 3:52 p.m., BROWN, using **Target Phone One**, told KENDALL BREWSTER to call “RANDY” (RANDALL BREWSTER) (call session #8465). BROWN told BREWSTER that he and JOHNSON did not have “shit” (they did not have any drugs). BREWSTER asked if “PEPE” (JOHNEAK JOHNSON) sold “all” (the drugs) he had. BROWN told BREWSTER that JOHNSON brought his money from drug sales to BROWN, but all the other drugs were gone. BREWSTER asked BROWN how much money he had. BROWN said “400” (\$400). BREWSTER told BROWN that he needed the rest of the money. BROWN told

BREWSTER that was dumb because they were going to run out of drugs. BREWSTER told BROWN that the money is supposed to be there. BROWN told BREWSTER that JOHNSON had not paid “his half” (JOHNSON’s portion of drug proceeds) yet. BREWSTER asked BROWN if BROWN gave JOHNSON a quarter and an eight ball” (one-quarter ounce and one-eighth of an ounce of powder or crack cocaine). BREWSTER told BROWN that he better have some “extra money” (money from the sale of other drugs) where BROWN was at. BROWN told BREWSTER that he had spent \$160. BREWSTER told BROWN that he believed BROWN was holding out on him, and believed that “something strange” was going on (with respect to BROWN’s possible sale of drugs without BREWSTER’s knowledge). BREWSTER then threatened to “fuck you and PEPE’s black ass up” (BREWSTER threatened to beat BREWSTER and JOHNSON).

58. On or about February 18, 2006, RANDALL BREWSTER, via KENDALL BREWSTER, supplied MARCUS BROWN with crack cocaine, which MARCUS BROWN distributed to JEFFREY BOWEN and OAIS COBBIN. Law enforcement subsequently seized approximately 27.7 grams of crack cocaine and approximately \$327 from JEFFREY BOWEN and OAIS COBBIN. *See* ¶52.

59. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others. *See* ¶53.

60. In late April and early May 2006, RANDALL BREWSTER had conversations on **BREWSTER Target Phone** with KENDALL BREWSTER regarding the cutting, packaging, and sale of heroin, and the sale of crack cocaine to TERRELL COVENS and the drug operation in The Square. *See* ¶¶54-55.

H. MARCELL BREWSTER¹⁷

Title III Calls/Seizures

61. On or about December 23, 2005, MARCUS BROWN, using **Target Phone One**, had a series of conversations with MARCELL BREWSTER regarding MARCELL BREWSTER's ability to supply BROWN with one kilogram of cocaine that BROWN would sell to UCE1.

a. At approximately 4:46 p.m., MARCELL BREWSTER called MARCUS BROWN on **Target Phone One** (call session #2359). BROWN told MARCELL BREWSTER to have "RANDY" (RANDALL BREWSTER) call BROWN back because BROWN's "guy from out of town" (UCE1) wanted a "whole thing" (a kilogram of cocaine), and was riding around with a "dub" (\$20,000). MARCELL BREWSTER asked BROWN if UCE1 wanted a "whole lick" (one kilogram of cocaine). BROWN said "yeah, soft" (powder cocaine). MARCELL BREWSTER told BROWN "man, I can probably do that shit" (provide the one kilogram of soft cocaine) and that it would cost a "dub" (\$20,000). BROWN told MARCELL BREWSTER that BROWN would charge UCE1 \$22,000. BROWN told MARCELL BREWSTER that the car UCE1 had contained a "slot in it" (one of UCE1's undercover vehicles is a white Dodge Intrepid that contains a hidden compartment purportedly used to store narcotics) so that UCE1 could pick the drugs up from MARCELL BREWSTER.

¹⁷The identification of MARCELL BREWSTER in this Affidavit is based on the following: First, law enforcement has been able to identify MARCELL BREWSTER's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One** and **BREWSTER Target Phone**. Second, during particular intercepted calls, MARCELL BREWSTER arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with MARCELL BREWSTER during which MARCELL BREWSTER has identified himself.

b. At approximately 4:58 p.m., BROWN, using **Target Phone One**, called MARCELL BREWSTER (call session #2365). MARCELL BREWSTER told BROWN “that’s a lot of shit [one kilogram of cocaine is a large quantity of narcotics], I want to get that shit [the cocaine] and do it [sell it].” MARCELL BREWSTER told BROWN that “we count the money in the car, then we gonna go to dude [BREWSTER’s supplier], and get the shit [cocaine].” MARCELL BREWSTER told BROWN that he wanted to make at least a few hundred dollars from the sale of cocaine. MARCELL BREWSTER also identified his supplier of cocaine as “this crazy ass mother fuckin’ Mexican, a Latin King [gang organization that operates in and around the Chicago area].”

c. At approximately 7:29 p.m., MARCUS BROWN, using **Target Phone One**, called RANDALL BREWSTER (call session #2390). BROWN told RANDALL BREWSTER that he had talked to MARCELL BREWSTER earlier. RANDALL BREWSTER asked BROWN if he wanted to do it the way that MARCELL BREWSTER told BROWN. BROWN told RANDALL BREWSTER that UCE1 wanted it “soft” (powder cocaine). RANDALL BREWSTER told BROWN that “it” (the one kilogram of powder cocaine) would be about “22” (\$22,000). BROWN advised that MARCELL BREWSTER said it would be “2” (\$20,000) (monitors then heard RANDALL BREWSTER talk to an individual in the background believed to be MARCELL BREWSTER about what MARCUS BROWN had just said). (The cocaine transaction did not occur.).

62. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others. *See* ¶53.

63. In late April 2006, MARCELL BREWSTER had conversations with RANDALL BREWSTER regarding the cutting, packaging, and sale of heroin. *See* ¶54.

I. TERRANCE BREWSTER¹⁸

64. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others. *See* ¶53.

65. In late April 2006, RANDALL BREWSTER had conversations on **BREWSTER Target Phone** with KENDALL BREWSTER and MARCELL BREWSTER regarding the cutting, packaging, and sale of heroin. Some of those calls referenced TERRANCE BREWSTER's role in packaging the heroin. *See* ¶54.

J. LAPRIEST GARY¹⁹

CI/CW Information

66. In February 2006, the CI informed law enforcement that a person the CI knows as "PREECY" (LAPRIEST GARY) sold "weight" (large amounts of narcotics) at Keeler Avenue and 13th Street in Chicago.

Non-Title III Calls/Seizures

¹⁸The identification of TERRANCE BREWSTER in this Affidavit is based on the following: First, law enforcement has been able to identify TERRANCE BREWSTER's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One**; and because law enforcement were present with TERRANCE BREWSTER on some of the occasions on which TERRANCE BREWSTER used **Target Phone One**. Second, during particular intercepted calls, TERRANCE BREWSTER arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with TERRANCE BREWSTER during which TERRANCE BREWSTER has identified himself.

¹⁹The identification of LAPRIEST GARY in this Affidavit is based on the following: First, the CI has identified LAPRIEST GARY. Second, during particular recorded calls, LAPRIEST GARY arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with LAPRIEST GARY during which LAPRIEST GARY has identified himself.

67. During the Spring of 2005, CW2 made approximately 4 consensually recorded telephone calls to ADONIS HOUSE, in which CW2 discussed and set up a narcotics transaction involving 4 ½ ounces of crack cocaine between HOUSE and UCE1. On or about April 5, 2005, GARY supplied HOUSE with approximately 4 ounces of crack cocaine, which HOUSE in turn supplied to CW2 and UCE1.

a. On April 5, 2005, CW2 contacted HOUSE at (773) 368-3408 to arrange the purchase of crack cocaine by UCE1. CW2 asked HOUSE if he was “ready,” and HOUSE replied in the affirmative, and told CW2 to call HOUSE on the phone when CW2 and UCE1 arrived at the Barber and Beauty Shop (hereinafter “BBS”) where they had previously met. UCE1 and CW2, who, prior to entering the undercover vehicle, had been searched for drugs, money, or other contraband with negative results, then traveled to BBS. Once there, HOUSE called CW2, who advised HOUSE that they were at BBS. They then waited for HOUSE to arrive.

b. When HOUSE arrived at BBS, HOUSE told CW2 that he (HOUSE) wanted CW2 to “ride with him” (travel in his vehicle) to obtain the narcotics. Prior to them leaving, UCE1 went to his/her vehicle with HOUSE and gave HOUSE \$2,700 in U.S. currency to purchase the crack cocaine. CW2, who was outfitted with a body recording device, and HOUSE then left the area, traveling in HOUSE’s vehicle. According to CW2, they then traveled to an area near Ohio Street and Cicero Avenue on the west side of Chicago. There, CW2 and HOUSE met with an individual known to CW2 as “PREECY” (LAPRIEST GARY). HOUSE and CW2 then entered GARY’s vehicle and drove to a location on the north side of Chicago, near Petersen and California Avenue. Once there, GARY left the vehicle and shortly returned with approximately 4 ounces of a substance believed to be crack cocaine.

c. CW2, HOUSE, and GARY then returned to BBS, where CW2 exited the vehicle and met with UCE1. Prior to CW2 leaving the vehicle, HOUSE gave CW2 \$300 in U.S. currency because the purchase was for only 4 ounces and not 4 ½ ounces as originally planned. Additionally, HOUSE gave CW2 \$50 for “middling” the transaction between HOUSE and UCE1. CW2 subsequently gave to the handling agents a total of \$350.

d. After meeting with UCE1, UCE1 and CW2 traveled to a prearranged location, where CW2 provided law enforcement with 4 ounces of suspected crack cocaine and \$350. Law enforcement then searched CW2 for the presence of money, drugs, or other contraband, with negative results. The substance CW2 obtained from HOUSE and GARY was later tested, and determined to be approximately 103.3 grams in gross weight of cocaine base, in the form of crack cocaine.

68. On or about May 20, 2005, GARY and Terrence Covens supplied ADONIS HOUSE with approximately 4 ½ ounces of crack cocaine, which HOUSE in turn supplied to CW2 and UCE1.

a. At approximately 7:41 p.m., CW2, who, prior to entering the UV, was searched for drugs, money, and contraband, with negative results, drove to BBS to meet HOUSE in order to purchase approximately 4 ½ ounces of crack cocaine. UCE1 and CW2 eventually observed HOUSE in a vehicle outside of BBS. CW2, who was outfitted with a body recording device, entered the vehicle, and had a discussion with HOUSE. According to CW2, HOUSE requested that CW2 travel with him (HOUSE) a couple of blocks away to pick up the crack cocaine. UCE1 then provided CW2 \$2,900.00 in order to purchase the four ounces of crack cocaine from HOUSE. UCE1 then went back inside the barbershop while CW2 got inside HOUSE's vehicle to drive to another location.

b. According to CW2 and surveillance reports, HOUSE and CW2 then drove to a location on La Cross Street between Fulton and Maple Avenue. At this location, HOUSE met with "PREECY" (LAPRIEST GARY). According to CW2, HOUSE and "PREECY" then went to "PREECY"'s house where HOUSE told CW2 they stored the narcotics. When HOUSE returned, he gave CW2 the crack cocaine and told CW2 to let him know if the drugs came up short because he (HOUSE) would take care of it. HOUSE also told CW2 that he got the crack cocaine from "Chuck" (Terrence Covens), but "Chuck" had been acting scared lately, so "Chuck" just dropped the crack cocaine off to HOUSE at PREECY's house, and left the area.

c. At approximately 8:29 p.m., HOUSE and CW2 returned to the barbershop in HOUSE's vehicle. CW2 then got back in the UV with UCE1 and traveled to a predetermined location, where CW2 provided law enforcement with the bag containing the suspected crack cocaine. Law enforcement searched CW2 for drugs, money, or other contraband, again with negative results. The suspected crack cocaine was tested and found to be 104.8 grams of cocaine base, in the form of crack cocaine.

69. On or about April 3, 2006, at approximately 7:59 p.m., CW2 made a consensually recorded phone call to "PREECY" (LAPRIEST GARY). During the conversation, CW2 told GARY that he/she was trying to get some prices like they did "last summer" (referring to previous crack cocaine deals on April 5, 2005 and May 20, 2005). CW2 and GARY agreed that they did not want to discuss too much on the phone, so CW2 told GARY that he/she would call him later next week and arrange a meeting. GARY agreed and wanted to make sure CW2 saved his phone number in his/her phone.

70. On or about April 14, 2006, CW2 arranged to meet with "PREECY" (LAPRIEST GARY) to discuss a future drug transaction. During a consensually recorded phone call to

“PREECY” (LAPRIEST GARY) during which CW2 asked to meet at the Headhunters Barbershop, 3840 West Madison Street at around 3:30 p.m. At approximately 4:49 p.m., law enforcement observed LAPRIEST GARY park his vehicle near Headhunters Barbershop, get out of his vehicle, and meet with CW2. According to CW2, CW2 and GARY discussed prices for future drug transactions, and then left the area separately.

K. WAYNE BROWN²⁰

CI/CW Information

71. In February 2006, the CI stated that “QUACK” (WAYNE BROWN) sells “weight” (a large quantity) in crack cocaine. The CI advised that WAYNE BROWN drives either a Chevy Impala, silver or grey in color, and/or a Lumina, red in color. The CI explained that WAYNE BROWN lived with JESSICA BROWN near Douglas Boulevard and Central Park Avenue in Chicago, Illinois.

Non-Title III Information/Seizures

72. On or about October 22, 2005, WAYNE BROWN, with the assistance of JESSICA BROWN, provided MARCUS BROWN and ADONIS HOUSE with approximately nine ounces of crack cocaine, which MARCUS BROWN and ADONIS HOUSE subsequently distributed to UCE1 and UCE2.

a. Before the transaction occurred, on or about October 20, 2005, UCE1 conducted a series of consensually recorded telephone calls to HOUSE to arrange the purchase of nine ounces of crack cocaine. During a consensually recorded conversation, UCE1 asked HOUSE if he talked to his "man" (drug supplier) about the “other thing” (9 ounces of crack cocaine). After

²⁰The identification of WAYNE BROWN in this Affidavit is based on the following: First, the CI has identified WAYNE BROWN. Second, law enforcement has been able to identify WAYNE BROWN’s voice because that voice has been intercepted on numerous times, particularly on **Target Phone One**; because WAYNE BROWN was identified or identified himself in many of those calls with the same name or alias name (“QUACK”) and because the voice was consistently associated with the same phone number(s). Second, during particular intercepted calls, WAYNE BROWN arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with WAYNE BROWN during which WAYNE BROWN has identified himself.

HOUSE told UCE1 that his "man" was ready, UCE1 told HOUSE that they would take care of it on "Saturday" (October 22, 2005).

b. On October 22, 2005, at approximately 1:35 p.m., UCE1, CW2, and UCE2 arrived at The Square in UCE2's undercover vehicle (hereinafter "the UV"). UCE1 then called ADONIS HOUSE to let him know that they had arrived. HOUSE and MARCUS BROWN were then observed walking from The Square and got inside UCE2's vehicle. After discussing the individuals who could supply UCE1 and UCE2 with crack cocaine, MARCUS BROWN told UCE1 and UCE2 that he was going to call his sister "Jessica" (JESSICA BROWN) to see if she obtain nine ounces of crack cocaine. MARCUS BROWN told UCE2 that JESSICA BROWN could get what UCE1 and UCE2 wanted. UCE1 and UCE2 drove their vehicles to the Dominick's food store located on the corner of Homan Avenue and Roosevelt Road.

c. At approximately 5:00 p.m., UCE1, UCE2, CW2, MARCUS BROWN, and HOUSE arrived at the Dominick's parking lot. Shortly after their arrival at the location, JESSICA BROWN arrived in a vehicle with WAYNE BROWN. JESSICA BROWN and WAYNE BROWN got out of the vehicle, walked over to where UCE2, CW2, HOUSE, and MARCUS BROWN were standing. After confirming that MARCUS BROWN was looking for nine ounces of crack cocaine, WAYNE BROWN left the area and returned within an hour. MARCUS BROWN and HOUSE entered his vehicle and gave the unknown black male the money, \$5,800.00, that they received from UCE1. UCE2 observed WAYNE BROWN count the money, and then give HOUSE two plastic bags. HOUSE and MARCUS BROWN then exited WAYNE BROWN's vehicle and gave two plastic bags containing a white hard substance believed to be crack cocaine to UCE2. UCE2 stored the plastic bags in a hidden compartment in the UV. At the same time, UCE1 paid HOUSE and

MARCUS BROWN \$500 for arranging the drug transaction. UCE1 and UCE2 then drove HOUSE, CW2, and MARCUS BROWN in the UV back to The Square.

d. UCE1 and UCE2 then drove the UV to a predetermined meet location, where they provided law enforcement with two plastic bags containing a white hard substance, believed to be crack cocaine. The substance inside of the two plastic bags totaled approximately 258.5 grams in gross weight, and tested positive for cocaine base, in the form of crack cocaine.

Title III Calls/Seizures

73. On or about December 15, 2005, WAYNE BROWN, through PATRICK FRAZIER and ALPHONSO STEWART, distributed 4 ½ ounces of crack cocaine to MARCUS BROWN and ADONIS HOUSE, who in turn distributed the crack cocaine to UCE2.

a. On or about December 13, 2005, UCE2 contacted MARCUS BROWN on **Target Phone One** regarding UCE2's interest in purchasing nine ounces of crack cocaine on December 15, 2005 (call sessions ## 1104, 1105, 1109, 1110, 1114, 1115, and 1122).

b. On or about December 15, 2005, at approximately 2:59 p.m., BROWN, using **Target Phone One**, made an outgoing call to WAYNE BROWN (call session #1421). MARCUS BROWN asked WAYNE BROWN where WAYNE BROWN was at since MARCUS BROWN's "people [UCE2] are ready." WAYNE BROWN asked MARCUS BROWN what "they" (UCE2) want. MARCUS BROWN told WAYNE BROWN that he (WAYNE BROWN) "already knew" (based on WAYNE BROWN's October 22, 2005 supply of nine ounces of crack cocaine to MARCUS BROWN and ADONIS HOUSE, that the quantity and drug type in this transaction would be nine ounces of crack cocaine). WAYNE BROWN told MARCUS BROWN that he would be over there (to BROWN's house) in less than 45 minutes.

c. At approximately 3:42 p.m., MARCUS BROWN, using **Target Phone One**, called WAYNE BROWN (call session #1450). WAYNE BROWN told MARCUS BROWN that his “man” (drug supplier) was not at the “crib” (house), but that his “man’s little man” (drug supplier’s worker) had brought WAYNE BROWN “some of that” (narcotics), but that was not what MARCUS BROWN wanted. WAYNE BROWN told MARCUS BROWN that “he” (worker) had given him that “soft” (powder cocaine). WAYNE BROWN further stated that when he opened the “lick” (drugs), “it” (the drugs) was “soft” (powder cocaine), “it wasn’t no motherfuckin’ hard” (crack cocaine).

d. At approximately 3:54 p.m, a gold Cadillac sedan (hereinafter “the Cadillac”), driven by WAYNE BROWN, arrived at Douglas Park in Chicago, Illinois and parked directly behind the UV in which WAYNE BROWN, ADONIS HOUSE, and UCE2 were sitting. Upon WAYNE BROWN’s arrival, UCE2 asked HOUSE if WAYNE BROWN was the same person from whom UCE2 had purchased crack cocaine on October 22, 2005. HOUSE responded that it was. WAYNE BROWN exited the Cadillac and approached the UV. HOUSE exited the UV and spoke to WAYNE BROWN outside of the UV. Shortly thereafter, MARCUS BROWN and UCE2 exited the UV and joined the discussion with WAYNE BROWN and HOUSE.

e. At approximately 4:00 p.m., WAYNE BROWN reentered the Cadillac. MARCUS BROWN, HOUSE, and UCE2 reentered the UV. WAYNE BROWN then drove to the Marathon Gas Station at the intersection of Van Buren and Sacramento, arriving at approximately 4:14 p.m. UCE2 followed in the UV, arriving at around the same time. Upon their arrival, MARCUS BROWN entered the Station for a brief time and then returned to the UV. HOUSE exited the UV and entered the passenger seat of the Cadillac. At approximately 4:19 p.m., WAYNE BROWN drove the Cadillac in which HOUSE was then riding as a passenger to the intersection of

West End and Mason. UCE2 followed in the UV in which MARCUS BROWN was traveling as a passenger.

f. Shortly after their arrival at approximately 4:40 p.m., a green Dodge arrived at the location. MARCUS BROWN exited the UV and approached the green Dodge, where he had a conversation with the two unidentified black male occupants. The green Dodge then exited the area. MARCUS BROWN then returned to the UV. The UV and Cadillac remain in the area until approximately 5:26 p.m., at which time both vehicles exited the area and drove near 5956 W. Chicago, arriving at approximately 5:35 p.m. At approximately 5:40 p.m., the vehicles returned to the intersection of West End and Mason, arriving at approximately 5:50 p.m. While in the area of West End and Mason, MARCUS BROWN informed UCE2 that WAYNE BROWN would only be able to supply UCE2 with 4 ½, rather than 9 ounces, of crack cocaine.

g. While parked at the location, MARCUS BROWN, WAYNE BROWN, UCE2, and ADONIS HOUSE exited their respective vehicles and spoke outside. At approximately 5:58 p.m., a white Buick (hereinafter “the Buick”) arrived at the scene. MARCUS BROWN walked up to the Buick and obtained a package from the passengers in the Buick. MARCUS BROWN reentered the UV. UCE2 and MARCUS BROWN drove the UV around the block and then parked in front of the Buick. During the drive around the block, UCE2 and MARCUS BROWN counted out \$2,800 in funds UCE2 had provided for the purchase of 4 ½ ounces of crack cocaine. UCE2 gave MARCUS BROWN \$2,800. MARCUS BROWN then gave UCE2 a clear plastic bag containing what appeared to UCE2 to be an off-white hard substance believed to be crack cocaine. UCE2 then gave MARCUS BROWN \$400 for facilitating the drug purchase. MARCUS BROWN exited the UV, and UCE2 departed the area. Surveillance followed the Buick as it departed the area. A police unit conducted a traffic stop of the Buick in the vicinity of 1358 N. Mason. During the

stop, law enforcement identified the driver as PATRICK FRAZIER, and the passenger as ALPHONSO STEWART. Law enforcement did not issue a ticket to the driver or detain either man.

h. After leaving the area of West End and Mason, UCE2 drove to a predetermined location. At that location, law enforcement retrieved from UCE2 a clear plastic bag containing a piece of an off-white hard substance believed to be crack cocaine. The contents of the bag were tested and found to contain approximately 128 grams in gross weight of cocaine base, in the form of crack cocaine.

L. KENNETH MARSHALL²¹

Title III Calls/Seizures

74. On or about March 7, 2006, MARCUS BROWN, using **Target Phone One**, had a series of conversations with KENNETH MARSHALL regarding MARSHALL's supply of narcotics to MARCUS BROWN.

a. At approximately 12:05 p.m., MARCUS BROWN, using **Target Phone One**, called KENNETH MARSHALL (call session #12922). MARCUS BROWN told MARSHALL that "they" (customers) liked that "shit" (narcotics), and they went through it quickly. MARSHALL told BROWN that he needed to go to the "store" (MARSHALL's drug supplier) one more time because he wanted to "hit" (provide) BROWN with one more "quarter" (1/4 ounce of narcotics). MARSHALL then complained to BROWN that it was "slow as hell" (drugs were not selling quickly

²¹The identification of KENNETH MARSHALL in this Affidavit is based on the following: First, law enforcement has been able to identify KENNETH MARSHALL's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One**; because KENNETH MARSHALL was identified or identified himself in many of those calls with the same name or alias name ("SUGAR RAY"). Second, during particular intercepted calls, KENNETH MARSHALL arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with KENNETH MARSHALL during which KENNETH MARSHALL has identified himself.

on the streets) especially since MARSHALL used to "pop off" (sell) "a little over a half" (½ ounce of narcotics) a day.

b. At approximately 6:31 p.m., MARCUS BROWN, using **Target Phone One** (call session #13032). BROWN asked MARSHALL if he was back from down south yet. MARSHALL told BROWN that he had just made it over there. When BROWN asked MARSHALL if he was for "real" (telling the truth), MARSHALL said that he had just been pulled over by the police no more than five minutes after he gave "that" (narcotics) to BROWN at 26th and Kostner (CPD records confirm that officers conducted a traffic stop of MARSHALL on that date and time).

c. At approximately 10:17 p.m., MARCUS BROWN, using **Target Phone One**, called KENNETH MARSHALL (call session #13118). BROWN asked MARSHALL if he remembered the first "one" (narcotics) that he got off of him earlier. After MARSHALL said he remembered, BROWN asked what the number was on that. When MARSHALL answered by saying "180" (\$180), BROWN told MARSHALL he was talking about the weight. MARSHALL then told BROWN that it was "7, 7.1" (grams). BROWN then told MARSHALL he would call him back

75. On March 8, 2006, KENNETH MARSHALL supplied MARCUS BROWN with 4 ½ ounces of crack cocaine, which MARCUS BROWN in turn supplied to CW2.

a. On or about March 7, 2006, UCE1 and MARCUS BROWN, using **Target Phone One**, had a series of conversations (call sessions ## 13056, 13065) regarding UCE1's interest in purchasing, through CW2, 4 ½ ounces of crack cocaine on March 8, 2006. BROWN told UCE1 that the cost would be "28" (\$2800).

b. On or about March 8, 2006, at approximately 12:05 p.m., MARCUS BROWN, using **Target Phone One**, called UCE1 (call session #13236). UCE1 told BROWN that he/she had just dropped off a car for his/her "guy" (CW2), so UCE1 wanted BROWN to call CW2

to determine a meet location. UCE1 also told BROWN that CW2 had “something” (money for BROWN for arranging the drug transaction) because UCE1 wanted to make sure that CW2 took care of BROWN.

c. At approximately 12:37 p.m., MARCUS BROWN, using **Target Phone One**, called KENNETH MARSHALL (call session #13251). BROWN asked MARSHALL for a "4 and a hit" (4 ½ ounces of crack cocaine). MARSHALL told BROWN it would take him thirty minutes to get "it" (crack cocaine), and it was "26" (\$2,600.00). When BROWN asked MARSHALL if he could do it for "25" (\$2,500.00), MARSHALL told BROWN he would call his supplier

d. Before the drug transaction took place, law enforcement met with CW2 and conducted a search of CW2 for drugs, cash, or other contraband, with negative results. Law enforcement then provided CW2 with \$2,800 in funds for the purchase of 4 ½ ounces of crack cocaine, and \$300 in funds for payment to BROWN for brokering the transaction, and outfitted CW2 with a body recording device. CW2 then stationed him/herself in the parking lot located at 19th Street and Karlov Avenue in The Square. Surveillance observed CW2 meet MARCUS BROWN at that location, and enter BROWN's van, which surveillance followed to an Auto Zone parking lot at the corner of Ogden and Pualaski. Surveillance saw MARSHALL arrive in a purple Chevrolet Equinox, Illinois temporary tag 912F169²², and supply BROWN with a clear plastic bag containing suspected crack cocaine. CW2 provided BROWN with \$2800 as payment for the 4 ½ ounces of crack cocaine. BROWN then provided CW2 with the bag containing the suspected crack cocaine.

²²According to Illinois Secretary of State records, the Equinox is a 2006 model, VIN 2CNDL63F566082394, registered to KENNETH K. MARSHALL, 1806 S. Komensky, Chicago, Illinois 60623.

Initially, CW2 paid BROWN \$150 of the \$300 as BROWN's brokerage fee. Later that same day, CW2 provided BROWN with the remaining \$150.

e. CW2 then met with law enforcement at a prearranged location, where CW2 provided officers with a plastic bag containing a substance believed to be crack cocaine. Law enforcement then searched CW2 for the presence of money, drugs, or other contraband, with negative results. The contents of the bag were tested and found to be approximately 127 grams in gross weight of cocaine base, in the form of crack cocaine.

76. On or about March 11, 2006, at approximately 2:56 p.m., MARCUS BROWN, using **Target Phone One**, called KENNETH MARSHALL, (call session #13925). BROWN called MARSHALL and told him that he had "something" (money from narcotic sales) for him, and he was "ready" (ready to sell some more narcotics). BROWN then asked MARSHALL if he had gone back to the "store" (MARSHALL's drug supplier). MARSHALL then told BROWN that he had been "there" (drug supplier location), and could give BROWN another "ball" (1/8 of an ounce of narcotics). BROWN and MARSHALL then have a disagreement as to what BROWN had sold in the past and what MARSHALL owed him for doing these sales. After going back and forth, MARSHALL finally agreed to give BROWN an "8" (1/8 ounce of narcotics) as payment. When BROWN asked MARSHALL's location, MARSHALL told BROWN that he was delivering an "8 ball" (1/8 ounce of narcotics), and that he would have to go home to get BROWN's "8 ball".

M. EARNEST BROWN²³

Title III Calls/Seizures

77. On or about December 5, 2005, MARCUS BROWN, using **Target Phone One**, had a conversation with EARNEST BROWN regarding drug sales in The Square. *See* ¶27.

78. January 20, 2006, at approximately 11:14 a.m., MARCUS BROWN, using **Target Phone One**, called EARNEST BROWN (call session #3819). MARCUS BROWN told EARNEST BROWN to get the “pills” (believed to contain ecstasy or crack cocaine) ready because BROWN was going to come and get “five” of them (five pills).

79. On or about January 23, 2006, at approximately 8:53 p.m., EARNEST BROWN, contacted MARCUS BROWN on **Target Phone One** (call session #4441). EARNEST BROWN asked MARCUS BROWN if he had “sold out” (sold all of his drugs) from the other night. MARCUS BROWN replied that he had not really been in The Square “like that” (BROWN had not been selling drugs in The Square). MARCUS BROWN indicated that he knew they (customers in The Square) would be waiting for the “shit” (drugs), and if he went over to The Square that night, the customers would want some. EARNEST BROWN then told MARCUS BROWN that he was “back on the ball” (had drugs to sell). MARCUS BROWN then said “for real” and told EARNEST BROWN that he would be at EARNEST BROWN’s location in a few minutes.

²³The identification of EARNEST BROWN in this Affidavit is based upon the following: First, law enforcement has been able to identify EARNEST BROWN’s voice because that voice has been intercepted on **Target Phone One**; because EARNEST BROWN was identified or identified himself in many of those calls with the same alias name (“D”, “DION” or “DENON”); and because the voice was consistently associated with the same phone number. Second, law enforcement has conducted a traffic stop of EARNEST BROWN during which he identified himself as EARNEST BROWN. During that same stop, law enforcement made a phone call to the telephone number believed to be used by EARNEST BROWN in an intercepted call on **Target Phone One**. A cellphone in EARNEST BROWN’s possession rang in law enforcement’s presence.

80. During the investigation, criminally pertinent calls were intercepted in which co-conspirators discussed EARNEST BROWN's distribution of marijuana. For instance, on or about February 19, 2006, at approximately 11:08 p.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS (call session #9857). MARCUS BROWN instructed HARRIS that MARCUS BROWN was going to get an ounce from "DENON" (EARNEST BROWN).

N. ADONIS HOUSE²⁴

CI/CW Information

81. In March 2005, CW2 advised he/she met an individual named "DON" (ADONIS HOUSE), who sold crack cocaine in The Square. A mutual acquaintance of CW2 and HOUSE introduced CW2 and HOUSE. In the Spring of 2005, CW2 subsequently had a series of recorded conversations with HOUSE during which CW2 discussed his/her interest in conducting a crack cocaine transaction with HOUSE. Those discussions resulted in HOUSE brokering two controlled crack cocaine transactions in April and May 2005 between LAPRIEST GARY and UCE1 and CW2. See ¶¶67-68.

82. In September 2005, CW2 advised that prior to ADONIS HOUSE's car accident, HOUSE was running a portion of the drug operation in The Square. CW2 recalled being in The Square with HOUSE and HOUSE receiving a cell phone call from an unknown individual. When

²⁴The identification of ADONIS HOUSE in this Affidavit is based on the following: First, CW2 has identified ADONIS HOUSE. Second, law enforcement has been able to identify ADONIS HOUSE's voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; because ADONIS HOUSE was identified or identified himself in many of those calls with the same alias name ("DON") and because the voice was consistently associated with the same phone number. Third, during particular intercepted calls, ADONIS HOUSE arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with ADONIS HOUSE during which ADONIS HOUSE has identified himself.

HOUSE hung up the phone, HOUSE told CW2 that the person on the phone was "b-u" or "burnt up" (meaning the person on the phone had sold all of their drugs and needed more delivered to them). CW2 stated that HOUSE made a phone call to an unknown female and told her to go to his house and get "something" (drugs) out of his bedroom. HOUSE told the unknown female where to look once she got inside of his bedroom (CW2 couldn't recall the location). Once the unknown female located "it" in his bedroom, HOUSE told her to wait outside of the building and someone would meet her out there to pick "it" up.

83. CW2 had another conversation with HOUSE in HOUSE's apartment located in The Square. While in HOUSE's apartment, CW2 and HOUSE discussed the drug operation inside of The Square. CW2 asked HOUSE who was running the drug operation while HOUSE was recovering from an accident in which HOUSE was involved. HOUSE told CW2 that "LONDA" was running the operation until he (HOUSE) recovered from his injuries. CW2 asked HOUSE if "LONDA" was SHALONDA BROWN and HOUSE replied "yes". CW2 asked HOUSE if "RELL" (TERRELL COVENS) was going to give him his "spot" back (let HOUSE run the drug operation again) when HOUSE's injuries had healed. HOUSE told CW2 that he'd (TERRELL COVENS) better or else HOUSE would start selling his own stuff (narcotics) in The Square.

84. In approximately October 2005, CW2 was visiting ADONIS HOUSE in The Square. CW2 stated that HOUSE was "directing traffic" (directing individuals to different building numbers inside of The Square, depending on which narcotic they wanted to purchase at that time). CW2 advised that drugs, including crack cocaine, heroin, and marijuana, are all sold at different buildings inside of The Square. During this visit, HOUSE told CW2 that "BAY BAY"'s (LAVELL COVENS) brother (TREVEL COVENS) was running drugs in The Square. HOUSE further stated that he was going to let TREVEL COVENS finish the rest of the week out and then position himself

(HOUSE) back in The Square. CW2 asked HOUSE if "RELL" (TERRELL COVENS) was going to let him have his position back in The Square. HOUSE told CW2 that "RELL" (TERRELL COVENS) better give HOUSE his position back or else HOUSE will sell his own narcotics, instead of selling TERRELL COVENS's narcotics.

Non-Title III Information/Seizures

85. On May 21, 2005, UCE1 and CW2 took ADONIS HOUSE to a heavy weight boxing fight at the United Center in Chicago, Illinois. During their time together, UCE1, CW2, and HOUSE had a conversation regarding the drug operation in The Square.

a. On May 21, 2005, UCE1 drove to The Square to pick up HOUSE. When UCE1 arrived at this location, he/she observed twenty to thirty individuals standing outside of a building. Based on prior training and experience, UCE1 believed that these individuals standing outside the building were selling narcotics. At this time, HOUSE was observed talking to one of the females standing outside. When HOUSE saw UCE1 and CW2, he told them he had to go inside the building to make sure things were secure. HOUSE also said that he had to tell the individuals standing outside of his building that he would be away from The Square for a couple of hours.

b. Once inside UCE1's vehicle, HOUSE reached inside his pocket and removed a clear plastic bag containing a green leafy substance believed to be marijuana. HOUSE asked UCE1 if he/she could move (sell) marijuana in Wisconsin (where UCE1 told HOUSE he/she was living at the time). UCE1 told HOUSE that he/she could. HOUSE said he would be willing to supply UCE1 with narcotics to deliver to Wisconsin.

c. During their conversations that evening, HOUSE told UCE1 about the drug operation inside The Square. According to HOUSE, two COVENS brothers (TERRELL and Terrence COVENS) run the drug operation inside The Square and are very intimidating. HOUSE

further said that the COVENS brothers have lots of money, and that they have other people conduct acts of violence for them. HOUSE estimated that the COVENS's operation sells approximately four and a half kilograms of narcotics every two days, and operates twenty-four hours a day, all year round. Before dropping HOUSE back at The Square at approximately 8:45 p.m., HOUSE exchanged phone numbers with UCE1.

86. As set forth above, ADONIS HOUSE brokered UCE1, UCE2 and/or CW2 with narcotics during the following controlled transactions:

a. April 5, 2005 distribution of approximately 4 ounces of crack cocaine to UCE1. HOUSE obtained the crack cocaine from LAPRIEST GARY. *See* ¶67.

b. May 20 2005 distribution of approximately 4 ½ ounces of crack cocaine to UCE1. HOUSE obtained the crack cocaine from LAPRIEST GARY and Terrence Covens. *See* ¶68.

c. October 22, 2005 distribution with MARCUS BROWN of approximately 9 ounces of crack cocaine to UCE1 and UCE2. MARCUS BROWN and HOUSE obtained the crack cocaine with the assistance of JESSICA BROWN from WAYNE BROWN. *See* ¶72.

87. On or about November 10, 2005, MARCUS BROWN and ADONIS HOUSE, with the assistance of JESSICA BROWN, distributed approximately 9 ounces of crack cocaine to UCE2.

a. On November 9, 2005, UCE2 made a series of consensually recorded phone calls to BROWN on **Target Phone One** to arrange the purchase of 9 ounces of crack cocaine from BROWN. During one of the resulting consensually recorded conversations, UCE2 told BROWN that he/she would be in Chicago the following day, November 10, 2005. UCE2 asked BROWN if they could “get something done” at that time (conduct a drug transaction). BROWN replied “Yea, what you want, 9 [nine ounces of crack cocaine]?” UCE2 confirmed that was what he/she wanted.

Later that same day, during another consensually recorded conversation, BROWN told UCE2 that his “guys” (suppliers) wanted “6” (\$6000) for “it” (the 9 ounces of crack cocaine).

b. On the morning of November 10, 2005, UCE2 drove the UV to The Square where he/she met with MARCUS BROWN and HOUSE, who entered the UV. UCE2 then drove MARCUS BROWN and HOUSE to a parking lot at Cermak and Cicero Avenues. While in the parking lot, MARCUS BROWN, using **Target Phone One**, made several unrecorded phone calls in the presence of UCE2. After one call, MARCUS BROWN told UCE2 that he had just contacted his supplier, who, according to MARCUS BROWN, had just “cooked” the cocaine into crack cocaine, which was still drying. MARCUS BROWN also contacted JESSICA BROWN, who UCE2 heard MARCUS BROWN refer to during the calls as “Jessica”. According to UCE2, JESSICA BROWN provided MARCUS BROWN with updates on where MARCUS BROWN’s supplier was at in relation to where UCE2, HOUSE, and MARCUS BROWN were located.

c. In the afternoon of November 10, 2005, UCE2 drove MARCUS BROWN and HOUSE in the UV to another parking lot, at Odgen and Pulaski Avenues. After arriving there, an unknown male (hereinafter “UM2”) arrived driving a bluish-green Chrysler pulled into the parking lot, and parked near the UV. UCE2 observed MARCUS BROWN exit the UV, walk over to UM2’s vehicle and have a conversation with UM2. During this same time, UCE2 provided HOUSE with \$5,900 for the purchase of the nine ounces of crack cocaine. UCE2 saw MARCUS BROWN return to the UV, and watched HOUSE give MARCUS BROWN the \$5,900. MARCUS BROWN returned to UM2’s vehicle and gave The UM the \$5,900. In exchange, UM2 provided MARCUS BROWN with a clear plastic bag containing a white hard substance, believed to be crack cocaine. MARCUS BROWN then walked back to the UV. UCE2 told BROWN to put the drugs in the hidden

compartment inside of the UV. UCE2 then drove both HOUSE and BROWN back to The Square. Before BROWN left the UV, UCE2 gave BROWN \$500 for facilitating the drug purchase.

d. UCE2 then drove the UV to a predetermined meet location, where UCE2 provided law enforcement with a plastic bag containing a white hard substance, believed to be crack cocaine. The substance inside of the plastic bag totaled approximately 260.6 grams, and tested positive for cocaine base, in the form of crack cocaine.

Title III Calls/Seizures

88. On or about December 15, 2005, WAYNE BROWN, through PATRICK FRAZIER and ALPHONSO STEWART, distributed 4 ½ ounces of crack cocaine to MARCUS BROWN and ADONIS HOUSE, who in turn distributed the crack cocaine to UCE2. *See* ¶73.

89. During the investigation, calls were intercepted on **Target Phone One** in which MARCUS BROWN and ADONIS HOUSE discussed the drug operation in The Square. For instance, on or about January 23, 2006, at approximately 10:49 p.m., BROWN called ADONIS HOUSE using **Target Phone One**. During the conversation BROWN told HOUSE that he and KENDALL BREWSTER had each bought “a sack” (bag of marijuana). HOUSE indicated that it was supposed to be “dro” (hydroponic marijuana). BROWN asked if it was a “sawbuck” (\$10 bag of marijuana) or a “nickel” (\$5 bag of marijuana). HOUSE said it was a “sawbuck” (\$10 bag of marijuana) and that he was going to grab “an ounce” from BROWN’s cousin (believed to be TERRELL COVENS). HOUSE informed BROWN that he was not going to play with (sell) “nickels” (\$5 bags of marijuana) and “dro” (hydroponic marijuana), but asked BROWN if he could “run it” (sell the drugs). BROWN said that they (BROWN and HOUSE) could do something (sell the marijuana). HOUSE explained that they could put the “boe” (street term for marijuana) in the “Bricks” (The Square), and the “C” (cocaine) on the next block.

O. MARCUS BROWN²⁵

CW/CI Information

90. On October 10, 2005, CW2 advised that he/she went out to eat with ADONIS HOUSE, MARCUS BROWN, aka "BIG G," and FREDERICK YOUNG, aka "FREDDIE MO." CW2 stated that while they were eating, CW2 and BROWN talked about the drug operation in The Square and BROWN told CW2 that he had been out of the loop. BROWN indicated that as a result of recent violence in The Square, he wanted to keep a low profile. BROWN advised that he was now ready to get back into The Square, and make some money selling drugs.

91. CW2 has advised that BROWN is a member of the NEW BREED street gang.

Non Title III Calls/Seizures

92. In late October 2005, UCE2 met with MARCUS BROWN at The Square in order to give BROWN **Target Phone One**, which UCE2 had obtained through the FBI. Previous to this meeting, UCE2 told BROWN that his/her "girl" had a connection with cellular phones, so UCE2 could give BROWN a phone that he could use for free. After obtaining **Target Phone One**, UCE2 went to The Square and met with BROWN, who was outside waiting for UCE2. During their conversation, BROWN asked UCE2 "How was it" (referring to the 9 ounces of crack cocaine that UCE1 and UCE2 purchased from BROWN and HOUSE on October 22, 2005). UCE2 told BROWN

²⁵The identification of MARCUS BROWN in this Affidavit is based on the following: First, law enforcement has been able to identify MARCUS BROWN's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One**; because MARCUS BROWN was identified or identified himself in many of those calls with the same alias name ("BIG G") and because the voice was consistently associated with the same phone number. Second, during particular intercepted calls, MARCUS BROWN arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations, in an official and undercover capacity, with MARCUS BROWN during which MARCUS BROWN has identified himself as MARCUS BROWN.

that the crack cocaine was like "butter" (slang term for good quality). UCE2 then gave BROWN the cellular phone and told BROWN that he would receive a text message within the next two hours. When the message came through, UCE2 told BROWN the phone would then be activated. Pen register data and Title III intercepts demonstrate that MARCUS BROWN has utilized **Target Phone One** since late October 2005 to engage in drug trafficking.

93. As set forth above, ADONIS HOUSE brokered UCE1, UCE2 and/or CW2 with narcotics during the following controlled transactions:

a. October 22, 2005 distribution with MARCUS BROWN of approximately 9 ounces of crack cocaine to UCE1 and UCE2. MARCUS BROWN and HOUSE obtained the crack cocaine with the assistance of JESSICA BROWN from WAYNE BROWN. *See* ¶72.

b. On or about November 10, 2005, MARCUS BROWN and ADONIS HOUSE, with the assistance of JESSICA BROWN, distributed approximately 9 ounces of crack cocaine to UCE2. *See* ¶87.

94. On March 16, 2006, CPD was conducting surveillance at The Square when officers observed MARCUS BROWN near the 1856 S. Karlov building yelling "rocks" "rocks", a common street term for crack cocaine. CPD officers placed BROWN under arrest for unlawful solicitation of business. During a pat-down search of BROWN, found \$630 United States Currency on his person. BROWN was released from custody on March 17, 2006.

Title III Calls/Seizures

95. On or about December 15, 2005, WAYNE BROWN, through PATRICK FRAZIER and ALPHONSO STEWART, distributed 4 ½ ounces of crack cocaine to MARCUS BROWN and ADONIS HOUSE, who in turn distributed the crack cocaine to UCE2. *See* ¶73.

96. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others. *See* ¶53.

97. On or about March 8, 2006, KENNETH MARSHALL supplied MARCUS BROWN with 4 ½ ounces of crack cocaine, which MARCUS BROWN in turn supplied to CW2. *See* ¶75.

98. Based on calls intercepted to and from **Target Phone One**, in mid-March 2006, MARCUS BROWN became a shift manager in The Square, supervising the sale of narcotics and the collection of proceeds from the sale of narcotics. For instance,

a. On or about March 10, 2006, at approximately 10:03 p.m., MARCUS BROWN, using **Target Phone One**, received an incoming call from RONALD TURNER, using **TURNER Target Phone Two** (call session #13764). During the call, TURNER asked BROWN if he was on his way to “the Bricks” (The Square). BROWN said that he was already there. TURNER said that he had “something” (narcotics) for BROWN. BROWN told TURNER that his car had run out of gas, but would push his car to The Square and “hit” (call) TURNER when he (BROWN) got back to “the Bricks” (The Square).

b. On or about March 11, 2006, at approximately 9:13 p.m., MARCUS BROWN, using **Target Phone One** (call session #13991), called RONALD TURNER on **TURNER Target Phone Two**. TURNER and BROWN discussed the night shift in The Square. BROWN told TURNER that the night shift runs from “nine to nine” (9 p.m. to 9 a.m.). TURNER told BROWN that he gave “that” (narcotics) to “STYLES” (LAVELL COVENS) because the night shift had not started yet. TURNER told BROWN to tell “STYLES” (LAVELL COVENS) to give “that” (narcotics) to him (BROWN) and that “RELLO” (TERRELL COVENS) said so.

c. On or about March 13, 2006, at approximately 3:03 p.m., MARCUS BROWN, using **Target Phone One** (call session #14359), called RONALD TURNER on **TURNER Target Phone Two**. TURNER said that he was on his way to “the Bricks” (The Square). BROWN stated that he was on his “last one” (last quantity of narcotics). TURNER replied “alright”. BROWN stated that he had “just started” (selling narcotics in The Square). BROWN asked TURNER if there was someone after him (someone who would work the next shift selling narcotics in The Square). TURNER replied “BRAIN” (TERRY COVENS). BROWN stated that he was back (working the next shift) after “BRAIN” (TERRY COVENS).

99. As set forth elsewhere in this Affidavit, during the course of the investigation MARCUS BROWN, using **Target Phone One**, has had numerous conversations with a number of co-conspirators about the drug operation in The Square.

P. JESSICA BROWN²⁶

CI/CW Information

100. In February 2006, the CI informed law enforcement that JESSICA BROWN used to work for the COVENS family, but now buys her own “stuff” (narcotics) and sells it on her own.

Non-Title III Information/Seizures

101. As set forth above, JESSICA BROWN assisted MARCUS BROWN and ADONIS HOUSE in obtaining approximately 9 ounces of crack cocaine on October 22, 2005 from WAYNE BROWN, which UCE1 and UCE2 subsequently purchased in a controlled transaction from MARCUS BROWN and HOUSE. *See* ¶72.

102. As set forth above, JESSICA BROWN assisted MARCUS BROWN and ADONIS HOUSE in obtaining approximately 9 ounces of crack cocaine on or about November 10, 2005 from the UM, which UCE2 subsequently purchased in a controlled transaction from MARCUS BROWN and HOUSE. *See* ¶87.

Title III Calls/Seizures

103. During the investigation, On December 3, 2005, at approximately 7:54 p.m., JESSICA BROWN called MARCUS BROWN on **Target Phone One** (call session #85). During the call, JESSICA BROWN asked MARCUS BROWN if he still had the “sack” (bag of narcotics). MARCUS BROWN said that he did, but told JESSICA BROWN that she would have to bring a

²⁶The identification of JESSICA BROWN is based on the following: First, CW2 identified JESSICA BROWN as MARCUS BROWN’s sister. Second, law enforcement has been able to identify JESSICA BROWN’s voice because that voice has been intercepted on numerous times, particularly on **Target Phone One**; because JESSICA BROWN was identified or identified herself in many of those calls with the same name, JESSICA. Third, during particular intercepted calls, JESSICA BROWN arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with JESSICA BROWN during which JESSICA BROWN identified herself.

“blunt” (marijuana cigarette) too. JESSICA BROWN stated that she would be off work in about an hour.

104. On December 22, 2005, at approximately 8:21 p.m., JESSICA BROWN called BROWN on **Target Phone One** (call session #2295). During the call, JESSICA BROWN told MARCUS BROWN that she had dinner at “Pumpkin’s house” (SHALONDA BROWN’s house). JESSICA BROWN told MARCUS BROWN that “Dot” (TREVEL COVENS) and others “be over there [at SHALONDA BROWN’s house] . . . doing the lick [selling narcotics].”

105. On January 26, 2006, at approximately 8:50 a.m., MARCUS BROWN, using **Target Phone One**, called JESSICA BROWN (call session #4962). MARCUS BROWN told JESSICA BROWN that he was at “DENON’s” (EARNEST BROWN’s) getting some “boe” (marijuana). JESSICA BROWN asked how it (the marijuana) looked, and MARCUS BROWN said that it (the marijuana) was “green” (marijuana is a leafy substance that is green in color). In the same conversation, JESSICA BROWN again asked how it (the marijuana) looked, to which MARCUS BROWN replied “it’s super green” (marijuana is a leafy substance that is green in color).

Q. JASON RATLIFF²⁷

106. In late April 2006, RANDALL BREWSTER had conversations on **BREWSTER Target Phone** with JASON RATLIFF and KENDALL BREWSTER regarding the purchase of firearms from JASON RATLIFF. For instance:

a. On or about April 21, 2006, at approximately 3:48 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called JASON RATLIFF (call session #80).

²⁷The identification of JASON RATLIFF is based on the following: First, law enforcement have identified JASON RATLIFF based on recorded conversations with JASON RATLIFF pursuant to a traffic stop on or about May 3, 2006. Second, JASON RATLIFF was identified or has identified himself in calls intercepted during this investigation.

BREWSTER and RATLIFF discussed meeting in approximately 30 minutes. RATLIFF described a “motherfucking Tech [type of firearm] brand new, fresh out of the box . . . niggers just got it out of the store today, brand new.” BREWSTER asked RATLIFF what RATLIFF wanted for the firearm. RATLIFF said he thought “11” (\$1100), and explained that his (RATLIFF’s) brother had just bought the firearm. BREWSTER asked “what kind of Tech [type of firearm]?” RATLIFF said that he thought it “got like a fifty round in it or something” (can hold 50 rounds of ammunition). BREWSTER asked “What kind of shells [ammunition] it shoot?” RATLIFF said “it’s a tech 9 [millimeter], it shoot 9’s [millimeter].” RATLIFF then talked about “that government issue .45 [caliber firearm].” BREWSTER asked RATLIFF to call him back. RATLIFF told BREWSTER that his brother should be delivering “it” (the Tech 9) to RATLIFF.

b. At approximately 4:00 p.m., KENDALL BREWSTER called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #81). RANDALL BREWSTER told KENDALL BREWSTER about the “brand new Tech 9” firearm that RATLIFF had for sale, explaining that “his [RATLIFF’s] brother just bought it right out of the store, still in a box.” RANDALL BREWSTER said RATLIFF wanted “1100” (\$1100). RANDALL BREWSTER further said that RATLIFF had a “45” (caliber firearm) too.

c. At approximately 4:48 p.m., JASON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #101). BREWSTER told RATLIFF that he was going to send another person to “see the shit” (see the firearms) after the sun goes down. RATLIFF said that he had the “4 Nickel” (.45 caliber firearm) and “the Tech” (Tech 9 firearm) on him. RATLIFF and BREWSTER agreed to talk later.

d. At approximately 4:50 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called KENDALL BREWSTER (call session #103). RANDALL BREWSTER told

KENDALL BREWSTER that RATLIFF had the “4 Nickel” (.45 caliber firearm) and “the Tech” (Tech 9 firearm) and wanted to bring “it” (the firearms) to The Square. RANDALL and KENDALL BREWSTER talked about having a third person negotiate the price of the purchase of the guns from RATLIFF.

e. At approximately 4:52 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called JASON RATLIFF (call session #104). RANDALL BREWSTER told RATLIFF that RANDALL BREWSTER’s brother KENDALL BREWSTER had told him that a third party thought that “11” (\$1,100) was “too high” (for the Tech), but that the third party really wanted to see the “4 nickel” (.45 caliber firearm) and “tech” (Tech 9 firearm). RATLIFF wanted RANDALL BREWSTER to let him know as soon as heard something with respect to the prospective sale of firearms.

f. At approximately 7:44 p.m., JASON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #180). RATLIFF told BREWSTER that he was “gonna bring all that shit [firearms]” to BREWSTER anyway. BREWSTER agreed and discussed with RATLIFF how RATLIFF should deliver the firearms.

g. At approximately 8:38 p.m., JASON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #211). RATLIFF told BREWSTER that he and his brother were “out there at Harrison and Homan.” BREWSTER told RATLIFF that they were supposed to be at the same place as last time – “16th and Keeler.” BREWSTER gave RATLIFF directions to “18th and Keeler” (near The Square).

h. At approximately 9:31 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called JASON RATLIFF (call session #232). RATLIFF told BREWSTER that “the guy” (BREWSTER’s buyer) only wanted the “Tech” (Tech 9 firearm), so RATLIFF only brought

BREWSTER's buyer the "Tech", but now BREWSTER's buyer wants "the other one too" (the .45 caliber firearm), so RATLIFF has to go home and get "the other one" (the .45 caliber firearm). RATLIFF asked BREWSTER if it is okay if RATLIFF waits to take the .45 caliber firearm to BREWSTER's buyer sometime later that night. BREWSTER said "yeah."

i. At approximately 11:33 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone**, called JASON RATLIFF (call session #246). BREWSTER told RATLIFF that he and his buyer were "ready for that other thing [.45 caliber firearm]." RATLIFF told BREWSTER that he was going to The Square and would stop by BREWSTER's house on the way back. Based on subsequent calls, it is your affiant's believe that JASON RATLIFF did not deliver the .45 caliber firearm to BREWSTER's buyer.

107. In early May of 2006, RANDALL BREWSTER had conversations on **BREWSTER Target Phone** with JASON RATLIFF, Individual L, and KENDALL BREWSTER regarding the purchase of narcotics and regarding obtaining firearms back from RANDALL BREWSTER. For instance:

a. On or about May 3, 2006, at approximately 12:11 p.m., BREWSTER, using **BREWSTER Target Phone**, called JASON RATLIFF (call session #3137). BREWSTER asked RATLIFF if he wanted what "he had said" (referring to narcotics). RATLIFF replied, "yes, it's going to be A-1 isn't it?" BREWSTER told him that it would be and stated, "you have my three (possibly \$300 for narcotics), you want me to hit you with one" (give him an amount of narcotics, possibly one ounce). JASON replied, "yes."

b. From approximately 1:59 p.m. through 2:45 BREWSTER, using **BREWSTER Target Phone**, spoke with RATLIFF regarding directions to BREWSTER's house on 7721 South Paulina in Chicago, Illinois.

c. On May 3, 2006 at approximately 2:37 p.m., RANDALL BREWSTER using **BREWSTER Target Phone**(call session #3200) called Individual L. BREWSTER called Individual L and told her to get three of them "big pieces" ready (quantity of narcotics). BREWSTER told Individual L that he was on his way. Individual L asked, "who?" BREWSTER replied, " I told you dude, Rat (JASON RATLIFF) from Indiana." Individual L asked BREWSTER how much he (RATLIFF) was going to give to her, and BREWSTER told Individual L "\$900."

d. At approximately 2:43 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone** (call session #3206), called Individual L. BREWSTER asked Individual L if she could see him (RATLIFF) because he had just turned on Paulina from 77th and Ashland. Individual L asked BREWSTER if he had said three big ones (referring to the narcotics), and BREWSTER said "yes, not the small one, the three big ones."

e. At approximately 2:46, RANDALL BREWSTER, Using **BREWSTER Target Phone** (call session #3212), called Individual L. BREWSTER told Individual L to go on the porch because he (JASON RATLIFF) could not see the address. Individual L asked what car he was in and BREWSTER indicated that he was already out of the car.

f. At approximately 2:47 p.m., BREWSTER, Individual L, and JASON RATLIFF had a conversation on **BREWSTER Target Phone** (call session #3215). During the conversation BREWSTER asked Individual L if he (RATLIFF) had given her the money. Individual L indicated that he had, and BREWSTER asked if it was \$900. Individual L said yes, and then asked, "what's that a 63?" BREWSTER then asked to speak to him (JASON RATLIFF). RATLIFF got on the phone and BREWSTER told him he had "two and a zip" (amount of narcotics), that he would front him (RATLIFF) another "half" (amount of narcotics), and then asked if he (RATLIFF) brought the "three" (possible money for fronted narcotics \$300). RATLIFF seemed confused, and

BREWSTER then asked him again if he had brought the money for the last half. RATLIFF confirmed that he did and BREWSTER told him, "I fronted you another half... that's three halves you got."

108. On May 3, 2006, surveillance, set up in the area of 77th Street and Paulina, observed JASON RATLIFF and JON RATLIFF meet at 7721 S. Paulina (Address of RANDALL BREWSTER). Shortly thereafter, both JASON RATLIFF and JON RATLIFF left the location and headed eastbound. Based on intercepted conversation over **BREWSTER Target Phone**, CPD officers acting in their ruse capacity, stopped the car. This meeting was audio recorded. A search of JASON RATLIFF revealed approximately 42 grams of suspected crack cocaine. Both individuals indicated that they could get guns in return for their release. Both JASON and JON RATLIFF called numerous individuals including RANDALL BREWSTER. While waiting to obtain firearms for the Officers, JASON and JON RATLIFF told the Officers that they supply guns to The Square.

a. At approximately 5:18 p.m., JASON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #3265). RATLIFF asked BREWSTER if he could call the guys that he sold that Tech (Tech-9 machine pistol) or AK (firearm) to, and see if he wanted to sell one of them back. BREWSTER asked him what had happened, and RATLIFF indicated that he had gotten into some "thick shit" with some people and he needed them (the firearms) back.

b. At approximately 5:19 p.m., RANDALL BREWSTER, using **BREWSTER Target Phone** (call session #3267), called KENDALL BREWSTER. BREWSTER stated to KENDALL BREWSTER that his guy (JASON RATLIFF) needed that "K" (firearm) back.

BREWSTER told KENDALL BREWSTER that he (JASON RATLIFF) would give them their money back for either one. KENDALL BREWSTER then told BREWSTER “o.k.”

c. At approximately 5:26 p.m., JASON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #3272). BREWSTER indicated that his brother (KENDALL BREWSTER) was going to get in touch with the guy who had purchased the guns. RATLIFF told BREWSTER that he had to get one of them back because he “got into some thick shit.” RATLIFF again indicated that he needed one of them back, and stated that he was trying to find somewhere else to get them from, but he wanted to see if BREWSTER could “rush one back real quick.” BREWSTER then told RATLIFF that they were going to try to sell it (the firearm) back to RATLIFF for the same price he sold it to them for. BREWSTER then said if you sold it to them for \$800, they are going to want \$800. RATLIFF told him that would be fine, and told BREWSTER to call him back.

109. Later that evening, JON RATLIFF's friend, Individual M, arrived on the scene. Individual M then agreed to go to Indiana to retrieve the weapons and return them to law enforcement officers. Surveillance officers followed Individual M to 5028 Olcott and a Marathon gas station in the immediate area. The female returned with a sawed off shotgun and a nickel plated Colt 45. Officers then released JASON and JON RATLIFF.

R. JON RATLIFF²⁸

Title III Calls/Seizures

²⁸The identification of JON RATLIFF is based on the following: First, law enforcement have identified JON RATLIFF based on recorded conversations with JON RATLIFF pursuant to a traffic stop on May 3, 2006. Second, JON RATLIFF was identified or has identified himself in calls intercepted during this investigation.

110. In late April of 2006, RANDALL BREWSTER had conversations over **BREWSTER Target Phone** with JON RATLIFF and KENDALL BREWSTER regarding the purchase of firearms from JON RATLIFF. For instance:

a. On or about on April 22, 2006, at approximately 11:42 a.m., JON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #332) and identified himself. BREWSTER explained that they (RANDALL and KENDALL BREWSTER) had been calling him all day and they want the .45 (gun). RATLIFF explained that his brother's (JASON RATLIFF) phone was off, and that's why he had called BREWSTER. RATLIFF told BREWSTER that he was trying to get more guns and that he had someone waiting with a "nine with two, ten rounds and a fifteen round (nine millimeter firearm). RATLIFF also stated that he had someone with a "K with a 75 round drum" (firearm). RATLIFF told BREWSTER that the "nine has a holster, two ten round and the fifteen round, and he (his supplier) wants \$450-\$500 for it." BREWSTER told RATLIFF that he could bring the "nine" (weapon) to him, and that he has \$400. RATLIFF indicated that he might need \$500, because he is going to get it for \$450. RATLIFF told BREWSTER that he was not charging him to bring it out there and that he was trying to keep his clientele and the price right. BREWSTER told RATLIFF that "JAY" (JASON RATLIFF) has been taxing them (charging extra money for delivery and service). RATLIFF told him that his price was reasonable. RATLIFF told him that he wanted \$800 for the "K", which he stated had a "75 round drum and two thirty rounds." RATLIFF told BREWSTER he could get him two "nines" for \$700 right now (nine millimeter firearms). BREWSTER told RATLIFF to bring him the two "nines."

b. At approximately 11:46 a.m., RANDALL BREWSTER, using **BREWSTER Target Phone** (call session #337) called JON RATLIFF. BREWSTER told RATLIFF to bring him

three "nines," (firearms) and that he would pay a "stack fifty" (\$1050). RATLIFF told him that was acceptable.

c. At approximately 12:31 p.m., JON RATLIFF called RANDALL BREWSTER on **BREWSTER Target Phone** (call session #349). RATLIFF indicated that he would need more than eleven and a half (\$1150) for all three firearms. Instead, RATLIFF was going to need "12 cash" (\$1200). RATLIFF told BREWSTER that he can "work something out on the hard side" and that the guns are "either Smith and Wesson, or HK with fifteen round clips." RATLIFF told him that he would "check out" the firearms but wanted to ensure that BREWSTER wanted all three firearms, and that he would. RATLIFF told BREWSTER that he (RATLIFF) needed 30-40 minutes to "work something out."

111. On or about May 3, 2006, CPD conducted a traffic stop of JASON and JON RATLIFF during which officers seized suspected crack cocaine from JASON RATLIFF. JASON and JON RATLIFF subsequently agreed to provide officers with firearms in exchange for their release. See ¶¶108-109.

S. QUENTIN REED²⁹

CW/CI Information

²⁹The identification of QUENTIN REED in this Affidavit is based on the following: First, the CI has identified QUENTIN REED. Second, law enforcement has been able to identify QUENTIN REED's voice because that voice has been intercepted on numerous times, particularly on **TURNER Target Phone**; because QUENTIN REED was identified or identified himself in many of those calls with the same name or alias name ("SWINDLE"). Third, during particular intercepted calls, QUENTIN REED arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has had conversations with QUENTIN REED during which QUENTIN REED identified himself.

112. In February and March 2006, the CI informed law enforcement that “SWINDLE” (QUENTIN REED) “runs” (supervises) the “caps” (capsules containing crack cocaine) in The Square. REED receives the crack cocaine from runner LEVELL HICKS.

Non-Title III Statements/Seizures

113. On or about on June 30, 2005, CPD recovered 2 firearms from QUENTIN REED. On that date, a CPD officer, in his role as a ruse officer, contacted Terrence Covens after Covens was released on bond from CPD custody. Covens told the Officer that he (Covens) would keep his promise to deliver four firearms. Covens stated that he currently only had two weapons. The Officer told Covens to get those weapons, and when Covens collected the other two weapons to call the Officer. CPD officers then met COVENS at the YMCA located at 3449 W. Arthington in Chicago, where Covens and REED were observed in a blue Ford Taurus. REED then exited the passenger side of the vehicle holding a long object wrapped in white cloth, walked to the Officer's vehicle and placed the object inside. Officers opened the cloth and recovered one SKS rifle and one handgun.

Title III Calls/Seizures

114. On or about February 16 and 17, 2006, QUENTIN REED spoke to RONALD TURNER on **TURNER Target Phone** regarding drug sales in The Square.

a. On February 16, 2006, at approximately 3:55 p.m., QUENTIN REED called RONALD TURNER on **TURNER Target Phone** (call session #65). REED asked TURNER if he and "RELL" (TERRELL COVENS) were going to handle that, because he would just have "VELL" (LEVELL HICKS) drop him off. TURNER asked if it was about that time (time to renew drug supply), and REED confirmed telling TURNER that he was on his last "G thing" (last series of

narcotics). TURNER asked him how much he had left, and REED told him that he had the whole thing.

b. On February 17, 2006, at approximately 4:31 p.m., QUENTIN REED using (773)-641-8183, called RONALD TURNER on **TURNER Target Phone** (call session #243). REED told TURNER that he needed some (needed drugs), and TURNER said ok. REED explained that he needed it right now, and TURNER replied that he had to get dropped off by his car.

115. On or about February 18, 2006, CPD arrested QUENTIN REED for being in possession of a controlled substance, namely four plastic bags containing approximately 100 capsules of suspect crack cocaine. On or about February 19, 2006, REED subsequently had a series of conversations about the impact of his arrest.

a. At approximately 9:48 p.m., QUENTIN REED called RONALD TURNER on **TURNER Target Phone** (call session #753). TURNER told REED that he was at the "Low Key" (an apartment that contains narcotics). REED replied, "what Low Key, RELLO?" (asking what apartment and referring to TERRELL COVENS). TURNER replied "yeah." REED told TURNER that he had just gotten out of jail. REED explained that Individual G had "snitched" on him (told the CPD officers that REED had narcotics in his possession). REED told TURNER that officers filed criminal charges against REED for "four capsule packs" (four packs of capsules containing crack cocaine). TURNER told REED that he had heard that REED had been caught with only "5 sacks" (five sacks of narcotics). REED described in detail to TURNER how he had been caught with the narcotics and what happened while detained by the police.

b. At approximately 11:45 p.m., RONALD TURNER using **TURNER Target Phone**, called QUENTIN REED (call session #774). TURNER told REED that "RELL" (TERRELL COVENS) was looking for him (REED). REED asked TURNER what TERRELL

COVENS wanted. TURNER told REED that he (REED) knew what he (COVENS) wanted. REED realized that COVENS wanted his money (money REED made in the sale of COVENS's narcotics). TURNER placed TERRELL COVENS on **TURNER Target Phone**. TERRELL COVENS told REED that he needed to get his money (from REED). TERRELL COVENS and REED discussed how much money REED owed TERRELL COVENS. REED told TERRELL COVENS that he had gotten caught with \$600 United States Currency, and "five packs" (five bags of narcotics). REED told TERRELL COVENS to have TURNER ring his (REED's) doorbell and REED would throw the money out the window. Finally, TERRELL COVENS told REED that they (TERRELL COVENS and TURNER) were coming over there (to REED's residence) right now.

116. On April 5, 2006, at approximately 4:34 p.m., QUENTIN REED called RONALD TURNER on **TURNER Target Phone** (call session #114). REED asked TURNER if he was going to "put him down" (let him sell narcotics), and TURNER said no, that he had already promised "FRO" (LAMONT HARRIS). REED then complained about how they keep skipping him, and TURNER argued that he (REED) is never out there. REED said he was outside every day, and indicated that he was out there now. TURNER told REED that he (TURNER) didn't see him (REED) and he (TURNER) puts whomever he sees out there first. REED then continued to complain that he had just seen "BRAIN" (TERRY COVENS) work the last three packs (narcotics).

117. On April 6, 2006, at approximately 8:25 a.m., QUENTIN REED called RONALD TURNER on **TURNER Target Phone** (call session #163). REED asked TURNER if "he can get down today" (sell narcotics in the Square), and TURNER told him (REED) yes. REED told TURNER that he was on his way out there right now.

T. LEVELL HICKS³⁰

CW/CI Information

118. In February 2006, the CI advised that “VELL” (LEVELL HICKS) is one of three individuals central to TERRELL COVENS’s crack cocaine operation in The Square. According to the CI, HICKS drops crack cocaine off to QUENTIN REED who then distributes the crack cocaine to the workers, who sell it in The Square. In approximately March 2006, the CI indicated that HICKS “runs the caps [of crack cocaine]” for TERRELL COVENS.

Non-Title III Calls/Seizures

119. On or about July 4, 2005, CPD officers were in The Square, when they observed HICKS drop to the ground one clear plastic bag containing approximately 23 tin foil packets containing suspect heroin. Officers recovered the bag and placed HICKS under arrest for possession of a controlled substance. HICKS stated to the Officers that he knew of the whereabouts of an SKS assault rifle and wanted to turn it in to the police. HICKS went with Officers to the home of Individual H, a relative of HICKS, at 5306 W. Congress Parkway in Chicago, Illinois. The Officers asked for and obtained from Individual H her consent to search her home. During the search, the Officers located a SKS assault rifle loaded with ten rounds of ammunition in the basement ceiling. Eight of the foil packets were tested and found to contain a total of 1.1 grams of heroin. The remaining 15 foil packets were not analyzed.

³⁰The identification of LEVELL HICKS in this Affidavit is based on the following: First, the CI identified LEVELL HICKS. Second, law enforcement has been able to identify LEVELL HICKS’s voice because that voice has been intercepted on numerous times, particularly on **TURNER Target Phone**; because LEVELL HICKS was identified or identified himself in many of those calls with the same name or alias name (“VJ” or “VELL”). Third, law enforcement has had conversations with LEVELL HICKS during which LEVELL HICKS identified himself.

120. On approximately October 5, 2005, CPD conducted a recorded and surveilled controlled purchase of crack cocaine and heroin from LEVELL HICKS, KENNETH SYKES, and ALMONETTA HEMPHILL. On that date, a UCO entered The Square a short distance away from the 1850 building, and dismounted his bike. The UCO observed HICKS standing near the entrance and the UCO asked HICKS for “one and one” (street term for one crack and one heroin). HICKS said “blows” and “rocks,” and directed the UCO to KENNETH SYKES and ALMONETTA HEMPHILL, who were nearby. SYKES delivered to the UCO 2 capsules containing a rocky substance, which were tested and found to contain a total of approximately .2 grams of cocaine, believed to cocaine base in the form of crack cocaine.³¹ HEMPHILL delivered to the UCO 2 tin foil packets containing, according to subsequent analysis, a total of approximately .2 grams of heroin.

121. On or about April 4, 2006, LEVELL HICKS provided a firearm at the direction of TREVEL COVENS to CPD Officers posing as corrupt officers, to secure the release of TREVEL COVENS, TERRY COVENS, Individual N, and RODNEY WILLETT. *See* ¶43.

Title III Calls/Seizures

122. On or about February 16, 2006, LEVELL HICKS and RONALD TURNER, using **TURNER Target Phone**, had a series of conversations regarding drug sales and police presence in The Square.

a. At approximately 10:04 p.m., HICKS called TURNER on **TURNER Target Phone** (call session #88). HICKS asked TURNER if he was around "SWINDLE" (QUENTIN

³¹Throughout this Affidavit, I refer to tests of controlled substances which were completed by the Illinois State Police Laboratory. That analysis tested controlled substances for the presence of cocaine, but not cocaine base. Based on my training and experience, and my involvement in this investigation, I believe that the substances described herein as “chunky,” “rocky,” or “rock-like” are cocaine base in the form of crack cocaine.

REED). TURNER said no. HICKS warned TURNER that there was police presence in The Square and the police "hit that bitch hard" (there are a lot of police in The Square). HICKS told TURNER that he must not want his money (money made from the sale of narcotics in The Square).

b. At approximately 11:46 p.m., TURNER, using **TURNER Target Phone** (call session #108), called HICKS and asked him where he had went. HICKS stated that they came up there (in The Square), and "they said the police were in the lot." HICKS asked TURNER if he was "straight" (if he had the narcotics in order) and TURNER replied, "yes."

c. At approximately 11:53 p.m., TURNER, using **TURNER Target Phone**, called HICKS (call session #113) and stated the "31's" (street term for police presence) went upstairs and HICKS replied, "alright." (Based on my experience in this investigation, I am aware that individuals that sell narcotics in The Square have a 'look-out' system, where if there is police presence in the Square, especially when there are narcotics being sold, individuals will notify each other so to avoid individuals getting arrested.).

d. At approximately 11:55 p.m., TURNER, using **TURNER Target Phone**, called HICKS (call session #116). TURNER asked HICKS if they "all cool" (regarding their narcotics sales). HICKS stated that they were cool. TURNER advised that a "Crown" (street term for Ford Crown Victoria, a vehicle commonly used by police) was "peeking around one of the buildings [in The Square]." HICKS stated he was told that the police were looking for TURNER. TURNER advised that he walked right into them.

U. **KENYATI JORDAN**³²

³²The identification of KENYATI JORDAN in this Affidavit is based upon the following: First, the CI has identified KENYATI JORDAN. Second, law enforcement has been able to identify KENYATI JORDAN's voice because that voice has been intercepted on numerous times, particularly on **Target Phone One** and **COVENS Target Phone One**; and because KENYATI

CW/CI Information

123. In February 2006, the CI informed law enforcement that KENYATI JORDAN serves as a runner for TREVEL COVENS's heroin line, delivering "ten and twenty dollar bags of blows in the Square" (heroin sold for \$10 or \$20 a bag).

Non-Title III Calls/Seizures

124. On approximately September 13, 2005, CPD conducted video surveillance in the area of the Square, and observed JORDAN conducting suspect narcotic transactions with unknown individuals.

125. On approximately January 31, 2006, CPD officers seized heroin from the apartment of SHANTA and SHAUN JAMES. SHANTA JAMES subsequently identified KENYATI JORDAN as the supplier of the heroin.

a. On approximately January 31, 2006, CPD officers set up video surveillance in The Square and observed SHAUN JAMES reach into a hole of a boarded up window and placed suspect narcotics in the window. Apparently unbeknownst to SHAUN JAMES, the Officer conducting video surveillance was secreted in the room in which the suspect narcotics were placed. After placing the narcotics in the room, SHAUN JAMES was then observed removing suspect narcotics and conducting multiple suspect narcotic transactions with unknown individuals. After each transaction, he would return the suspect narcotics to the boarded up area. SHAUN JAMES was then overheard talking to SHANTA JAMES, and stated that he was "BU"(burned up, had run out of narcotics). SHAUN JAMES was then observed going into the 1850 S. Karlov building in The

JORDAN was identified or identified himself in many of those calls with the same name or alias name. Third, law enforcement has had conversations with KENYATI JORDAN during which KENYATI JORDAN identified himself.

Square and out of sight. Upon his return from said building he reached his hand into the same boarded up window, and placed down a strip of eleven foil packets. An officer then recovered the eleven packets of suspect heroin, the contents of which were tested and found to contain approximately 1.2 grams of heroin.

b. After conducting the above surveillance, officers then left the point of surveillance and then relocated to apartment 301 on the third floor of the 1850 S. Karlov building, the known residence of SHANTA JAMES. SHANTA JAMES agreed to a consensual search of the apartment which resulted in the recovery of approximately 199 foil packets of suspect heroin. Subsequent analysis of the substance inside of the foil packets indicated that it was a total of approximately 39.8 grams of heroin. SHANTA JAMES told the officers that the foil packets containing suspect heroin belonged to her brother, SHAUN JAMES, who had received the packets of heroin from "TONE" (KENYATI JORDAN).

Title III Calls/Seizures

126. On or about December 26, 2005, at approximately 4:15 p.m., MARCUS BROWN using **Target Phone One**, called KENYATI JORDAN (call session # 2752). BROWN asked JORDAN where he was, and JORDAN told him he was going to the "Key" (place where drugs are bagged up). BROWN said ok, and that he "didn't want no shit [narcotics of poor quality]" and just wanted to see what was good. JORDAN said they should "bag up" (bag up narcotics) in an hour. BROWN told JORDAN to call him when he gets to the "crib" (residence).

127. On or about February 7, 2006, at approximately 5:15 p.m., KENYATI JORDAN called MARCUS BROWN on **Target Phone One** (call session # 7330). Prior to the conversation beginning, JORDAN can be heard in the background stating that everything is complicated except heroin and crack. JORDAN told BROWN he was on "rotation" (a shift working the drug operation

at The Square). JORDAN stated that he would be out until 1:30 in the morning, and that it was a heavy “rotation” (meaning that a large volume of drug sales were being conducted during that shift).

128. On February 14, 2006, at approximately 4:24 p.m., SHALONDA BROWN using **Target One Phone** called KENYATI JORDAN (call session # 9014). During the conversation, JORDAN told BROWN that he was "chillin" (relaxing) before he goes out and does his "rounds" (works his shift in the drug operation in The Square).

129. On or about March 25, 2006, at approximately 3:05 p.m., KENYATI JORDAN called TERRELL COVENS on **COVENS Target Phone**, (call session # 1393). JORDAN told COVENS to tell "SWINDLE" (QUENTIN REED) that he needed those “receipts” (money). COVENS stated that they are getting ready to "slide" (travel) over there. JORDAN told COVENS he could meet up with them if he (REED) had “them” (the money) on him. COVENS can be heard asking a male (believed to be REED) in the background if he has the receipts. COVENS and JORDAN discuss that REED has some money on him. JORDAN wanted to speak with REED, but COVENS told JORDAN that they (COVENS and REED) would come by where JORDAN was located.

V. KENNETH STARKS³³

Non-Title III Statements/Seizures

130. On or about October 7, 2005, CPD conducted a recorded and surveilled controlled purchase of crack cocaine from KENNETH STARKS and SHANTA JAMES in The Square. On that date, video surveillance captured STARKS directing pedestrian traffic to SHANTA JAMES,

³³The identification of KENNETH STARKS in this Affidavit is based on the following: First, law enforcement identified a photograph of KENNETH STARKS as the individual who, along with SHANTA JAMES, distributed crack cocaine on or about October 7, 2005. Second, calls pertaining to KENNETH STARKS were intercepted on **Target Phone One** during which co-conspirators identified STARKS by his nickname (“SHAQ”).

who would then conduct suspected narcotics transactions with unknown individuals. A CPD UCO entered the courtyard, approached STARKS, and told him that he wanted “caps” (capsules containing crack cocaine). STARKS pointed the UCO in the direction of SHANTA JAMES. The UCO then walked towards the 1850 S. Karlov building in The Square where SHANTA JAMES was located and told her he wanted 2 “caps.” The UCO then handed her \$10 in exchange for two clear capsules containing suspect crack cocaine. Subsequent analysis of the capsules indicated that they contained a total of approximately .1 gram of a rocky substance, believed to be crack cocaine.

Title III Calls/Seizures

131. During the course of the investigation, criminally pertinent conversations were intercepted in which co-conspirators discussed KENNETH STARKS. For instance, on December 31, 2005 at approximately 11:34 a.m., RANDALL BREWSTER, using (773) 209-4530 called MARCUS BROWN on **Target Phone One** (call session #3257). BREWSTER was returning BROWN's call who indicated that he (BROWN) was calling for "SHAQ" (KENNETH STARKS). BROWN did not know why STARKS wanted to speak to BREWSTER. BREWSTER then complained that he had been fronting STARKS (providing narcotics prior to obtaining money), and when he (BREWSTER) asked him (STARKS) to run a couple of "jabs" (bags or strips containing capsules containing crack cocaine) that he had, and STARKS said no. BREWSTER then said that when he went to get the money from STARKS (money to pay for the narcotics that had been fronted), he (STARKS) acted like he didn't want to give it to him.

W. JOHNEAK JOHNSON³⁴

³⁴The identification of JOHNEAK JOHNSON in this Affidavit is based on the following: First, law enforcement has been able to identify JOHNEAK JOHNSON's voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; and because JOHNEAK JOHNSON was identified or identified himself in many of those calls with the same name or alias

Title III Calls/Seizures

132. On or about February 10, 2006, undercover officers seized crack cocaine from JOHNEAK JOHNSON.

a. At approximately 1:30 p.m., JOHNEAK JOHNSON spoke to MARCUS BROWN on **Target Phone One** (call session #7992). JOHNSON asked BROWN if BROWN still had a “whole one” (one of a quantity of narcotics) for him. JOHNSON explained that he had \$120, but still owed BROWN \$40. BROWN asked JOHNSON if he wanted to buy “one” (quantity of narcotics). JOHNSON said “yep.” BROWN told JOHNSON to come over to his house.

b. Shortly thereafter, CPD officers observed JOHNSON walking westbound on 18th Street from Keeler. Officers then observed JOHNSON enter BROWN’s residence located at 4338 W. 18th Street. Minutes later, officers saw JOHNSON exit BROWN’s residence and begin walking eastbound on Keeler. Officers approached JOHNSON and conducted a field interview with JOHNSON. Officers, who were role-playing as corrupt police officers, told JOHNSON that they only arrest people for possession of firearms, rather than drugs. JOHNSON then told Officers that he had a bag of marijuana in his underwear and wanted to toss it in the sewer. Officers allowed JOHNSON to remove an object from his underwear and observed him begin walking toward the sewer. In response to a request from Officers, JOHNSON dropped a clear knotted plastic bag containing suspected crack cocaine to the ground. Officers recovered the bag containing the suspect narcotics. The contents of the bag were subsequently tested and found to contain approximately 3.2 net grams of cocaine base, in the form of crack cocaine.

name (“PEPE” or “PAY PAY”). Second, during particular intercepted calls, JOHNEAK JOHNSON arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement identified a photograph of JOHNEAK JOHNSON as the person from whom they seized suspect crack cocaine on February 10, 2006.

133. As set forth above, on or about February 12, 2006, MARCUS BROWN, using **Target Phone One**, had a series of conversations with KENDALL BREWSTER regarding drug sales in which BROWN identified JOHNEAK JOHNSON as the individual who had run out of drugs. *See* ¶57.

134. On or about February 24, 2006, JOHNEAK JOHNSON, JERMAINE HARRIS and MARCUS BROWN had a series of conversations regarding drug sales in The Square.

a. At approximately 7:14 p.m., BROWN called JOHNEAK JOHNSON and JERMAINE HARRIS using **Target One Phone** (call session #10733). BROWN asked JOHNSON what was happening in The Square. JOHNSON replied that they were still at The Square, and that “MANO” (DESMOND ROBERTSON) had just “popped back out with those capsules” (started selling crack cocaine). BROWN asked JOHNSON how he was going to get the “shit” (drugs). JOHNSON said that he would send HARRIS to pick up the drugs. JOHNSON asked BROWN if he “had 12 and 12” (strip of 12 capsules of crack cocaine). BROWN told JOHNSON that he was making the “24’s” (a strip of 24 capsules containing crack cocaine). JOHNSON and BROWN discussed how HARRIS would pick up the drugs. Eventually, HARRIS got on the phone and told BROWN that he would walk over and get the van to pick up the drugs. HARRIS also told BROWN that he did not want BROWN to think that they would be able to sell all of the “24’s” (strip of 24 capsules containing crack cocaine) tonight because those “niggers are on alert” (people at The Square are watching who is selling). BROWN told him that he did not have to hide because BROWN was “working” in The Square and had “hot shit” (good drugs).

b. At approximately 9:15, JOHNEAK JOHNSON called MARCUS BROWN on **Target One Phone** (call session #10767). JOHNSON asked BROWN what he had given JERMAINE HARRIS. BROWN told him that he gave HARRIS three “24’s” (strips of 24 capsules

containing crack cocaine). JOHNSON asked BROWN whether all three were "24's" (strips of 24 capsules containing crack cocaine), and BROWN confirmed that they were and that he had counted them in front of JERMAINE HARRIS. JOHNSON told BROWN that he had not counted the one JERMAINE HARRIS had given him, but so that so far he had made \$160. BROWN told JOHNSON that once he finished selling the drugs he had given them that HARRIS should give him the "deuce" (\$200). BROWN told him that he should have given each of them three "24's" (strips of 24 capsules containing crack cocaine), because the drugs were not going to last.

c. At approximately 10:22 p.m., JOHNEAK JOHNSON called BROWN on **Target One Phone** (call session#10782). During the conversation BROWN asked JOHNSON how they were doing selling drugs in The Square. JOHNSON told BROWN that they had just finished "one" (strip of 24 capsules containing crack cocaine), but then asked BROWN if his cousin (TERRELL COVENS) was "cool with it" (could they sell drugs for BROWN in The Square). BROWN told JOHNSON that "they were cool." JERMAINE HARRIS then got on the phone to tell BROWN that they had already "done one" (sold a strip of 24 capsules containing crack cocaine). BROWN then told HARRIS that "RELLO" (TERRELL COVENS) would not say anything because they were "all cool" (BROWN was allowed to sell in The Square).

135. On or about March 2, 2006, law enforcement seized crack cocaine and two firearms from MARCUS BROWN, KENDALL BREWSTER, TERRANCE BREWSTER, who were assisted by RANDALL BREWSTER, MARCELL BREWSTER, TERRANCE BREWSTER, JOHNEAK JOHNSON, and others. *See ¶53.*

X. ALMONETTA HEMPHILL³⁵

³⁵The identification of ALMONETTA HEMPHILL in this Affidavit is based on the following: First, the CI identified ALMONETTA HEMPHILL. Second, during the interception of

CI/CW Information

136. In March 2006, CI advised law enforcement officers that ALMONETTA HEMPHILL had "hustled caps" (sold capsules filled with crack cocaine) in the Summer of 2005. The CI further stated that "BOO" (RONALD TURNER) hid his "licks" (narcotics) in HEMPHILL's apartment. The CI also advised that TURNER and HEMPHILL date one another.

Non-Title III Calls/Seizures

137. On or about October 5, 2005, CPD conducted a recorded and surveilled controlled purchase of crack cocaine and heroin from LEVELL HICKS, KENNETH SYKES, and ALMONETTA HEMPHILL in The Square. *See* ¶120.

wire communications to and from **TURNER Target Phone**, co-conspirators referred to an individual named "ALMONETTA." Third, law enforcement identified ALMONETTA HEMPHILL during a traffic stop related to this investigation.

Title III Calls/Seizures

138. On February 16, 2006, at approximately 10:20 p.m., QUENTIN REED called RONALD TURNER on **TURNER Target Phone** (call session #98). REED told TURNER to put "that" (narcotics) down in "ALMONETTA's crib" (HEMPHILL's residence) and tell HEMPHILL that he (REED) was going to come knock on her window and get it from her.

139. On or about April 7, 2006, KELVIN JACKSON distributed 2 kilograms of cocaine to TERRELL COVENS through RONALD TURNER and ALMONETTA HEMPHILL. Law enforcement subsequently seized the 2 kilograms of cocaine from RONALD TURNER. *See* ¶30.

Y. CALVIN MCWRIGHT³⁶

CW/CI Information

140. During the Summer of 2004, CW1 advised that CALVIN MCWRIGHT sold narcotics for TERRELL COVENS.

Non-Title III Information/Seizures

141. On or about November 3, 2004, CPD was patrolling the south parking lot of The Square, during which officers identified and approached MCWRIGHT. MCWRIGHT fled on foot from CPD officers, who eventually detained MCWRIGHT near the 1866 S. Karlov building in The Square. During a protective pat down of MCWRIGHT's outer clothing, an officer noted that there were items consistent with the size and shape of crack cocaine contained in capsules and plastic bags in the front right pocket of MCWRIGHT's hooded sweatshirt. The Officer searched the front right pocket of the sweatshirt and found 7 bags containing suspect crack cocaine, 22 capsules containing

³⁶The identification of CALVIN MCWRIGHT in this Affidavit is based on the following: First, the CI identified CALVIN MCWRIGHT. Second, law enforcement has had conversations with CALVIN MCWRIGHT during which CALVIN MCWRIGHT has identified himself.

suspect crack cocaine, and approximately \$279 in United States Currency. MCWRIGHT was advised of his rights and stated in regards to the individuals who were providing security for the drug operation at The Square, "they fucked up, when I get out of here, I'm beating someone's ass."

142. The substances inside of the 7 bags were tested and found to be a total of 4.8 grams of a chunky substance, believed to be crack cocaine. The substances inside of 3 of the capsules were tested, and found to be a total of .3 grams of a chunky substance of cocaine, believed to be cocaine base in the form of crack cocaine. The substances inside of the remaining 19 capsules were not tested.

Z. LAMONT HARRIS³⁷

CW/CI Information

143. In February 2006, the CI informed law enforcement that LAMONT HARRIS "runs" crack cocaine to shift supervisors in The Square for LAVELL COVENS. In March 2006, the CI informed law enforcement that TERRELL COVENS is continuing to use HARRIS in to "run caps" (of crack cocaine) to The Square.

Non-Title III Calls/Seizures

144. On approximately September 13, 2005, CPD conducted a recorded and surveilled purchase of crack cocaine from HARRIS. A CPD UCO walked into the courtyard near the 1866 S. Karlov building in The Square. HARRIS approached the UCO, and asked the UCO what he needed.

³⁷The identification of LAMONT HARRIS in this Affidavit is based on the following: First, the CI has identified LAMONT HARRIS. Second, law enforcement has identified LAMONT HARRIS's voice, because that voice has been intercepted numerous times, particularly on **COVENS Target Phone**; and because during many of those calls, LAMONT HARRIS referred to himself or was referred to by his name or nickname ("FRO FRO"). Third, law enforcement had conversations with LAMONT HARRIS during which LAMONT HARRIS has identified himself.

The UCO stated that he needed “caps” (capsules containing crack cocaine). When HARRIS asked how many the UCO wanted, the UCO replied "four." HARRIS and the UCO walked over to the 1866 building. The UCO provided HARRIS with a \$20 bill, and then dropped a clear ziplock bag with a spade logo containing a rock like substance. The substance inside of the bag was tested and found to contain .5 grams of a rocky substance, believed to be crack cocaine.

145. On or about on October 1, 2005, CPD officers conducted video surveillance in The Square, which captured LAMONT HARRIS making several hand-to-hand narcotics transactions with unidentified individuals, and counting proceeds of those transactions.

146. On or about October 5, 2005, CPD officers conducted video surveillance in The Square, which captured LAMONT HARRIS holding suspect narcotics in his hand while he spoke with TREVEL COVENS and LEVELL HICKS.

Title III Calls/Seizures

147. On March 18, 2006 at approximately 7:16 p.m., LAMONT HARRIS called TERRELL COVENS on **COVENS Target Phone** (call session #948). HARRIS identified himself, and COVENS asked, "is it that time?" (time for COVENS to distribute additional narcotics to HARRIS). HARRIS told COVENS that he needed some "cush" (drugs/work), because he was “BU” (burned up, needed more drugs). COVENS told HARRIS that he would meet HARRIS at HARRIS’s location.

148. On or about March 19, 2006, at approximately 11:33 p.m., TERRELL COVENS, using **COVENS Target Phone**, called LAMONT HARRIS (call session #1052). COVENS asked for "FRO" (LAMONT HARRIS), who then got on the phone. COVENS asked him if he was "cool" (had enough narcotics). HARRIS asked him who was on the phone, to which COVENS replied "RELLO" (TERRELL COVENS). HARRIS then told him that he was decent and that "BOO"

(RONALD TURNER) had just "slid on him" (provided him with narcotics) not too long ago. COVENS asked HARRIS "what it look like" (how are the sales), and HARRIS told him he was on selling his second one portion of narcotics. COVENS said ok, and then asked who was out there. HARRIS told him, among others, "HERB" (HERBERT ROBINSON) and "SHAUN" (SHAUN JAMES). COVENS told HARRIS that he would "slide back" (come over) there in a minute.

149. On or about March 28, 2006, at approximately 10:35 p.m., LAMONT HARRIS called TERRELL COVENS on **COVENS Target Phone** (call session #1571). HARRIS asked COVENS if he had said to give "BRISCO" (SHAUN JAMES) "4 for the 50" (four bags of marijuana for \$50). COVENS told HARRIS to give him "4 for the 50" (four bags of marijuana for \$50), and stated that was "30 off" (\$30 off the normal cost).

150. On or about April 2, 2006, at approximately, 11:51 p.m., LAMONT HARRIS called TERRELL COVENS on **COVENS Target Phone** (call session #2133). HARRIS told COVENS that he was "low" (running out of narcotics). COVENS said alright, and HARRIS then asked him if he knew which one he was talking about. COVENS then said yeah, and asked, "which one, the fifties?" (an amount of some narcotic). HARRIS replied, "crack" (crack cocaine) and COVENS again asked "fifties?" HARRIS then stated "C" (cocaine), to which COVENS replied, "man, alright."

151. On or about April 5, 2006, at approximately 5:37 p.m., LAMONT HARRIS called TERRELL COVENS on **COVENS Target Phone** (call session #2362). LAMONT HARRIS told COVENS that he needs to "hit" (call) his man because the "land is dry" (the narcotics are gone).

AA. TION NEWTON³⁸

CW/CI Information

152. In March 2006, the CI informed law enforcement that “TION” (NEWTON) works side-by-side with "BAY BAY" (LAVELL COVENS), in connection with the drug operation in the Square. The CI further stated that NEWTON sells the "sawbuck rocks" (\$10 bags of crack cocaine) with LAVELL COVENS.

Non-Title III Calls/Seizures

153. On or about October 20, 2005, CPD Officers entered the 1850 S. Karlov building, and observed SHANTA JAMES standing in front of the building with several unknown male subjects. As officers approached the location, SHANTA JAMES walked into the building and the unknown males ran away from the location. Once in the hallway, officers observed SHANTA JAMES standing on a milk crate reaching into a hole in the ceiling. Standing next to JAMES was TION NEWTON. Officers detained JAMES and NEWTON. The Officers recovered a blue plastic bag containing approximately 162 capsules of suspected crack cocaine and approximately 23 foil packets containing suspect heroin from the hole that JAMES had reached into. The Officers also recovered a approximately \$602 in United States Currency from the ceiling and JAMES. The substance in the capsules were tested and found to be approximately 15.9 grams of a rocky substance containing cocaine, believed to be cocaine base in the form of crack cocaine. The substance in the packets was tested and found to be approximately 5.1 grams of heroin.

³⁸The identification of TION NEWTON in this Affidavit is based on the following: First, the CI has identified TION NEWTON. Second, law enforcement has identified NEWTON's voice because that voice has been intercepted numerous times, particularly on **COVENS Target Phone**; and because TION NEWTON was identified or identified himself in many of those calls with the same name or alias name (“T-MAC” or “MAC”). Third, law enforcement has had conversations with TION NEWTON during which TION NEWTON has identified himself.

Title III Calls/Seizures

154. On or about March 18, 2006, TION NEWTON had a series of conversations with TERRELL COVENS on **COVENS Target Phone** regarding NEWTON's possible purchase of a large quantity of narcotics.

a. At approximately 1:38 p.m, TERRELL COVENS, using **COVENS Target Phone**, called TION NEWTON (call session #893). NEWTON told COVENS that he still had "the order" (needed an amount of drugs). COVENS told NEWTON that he was going to give his supplier a call, and see what he was going to give the drugs to them for because the prices are outrageous.

b. At approximately 5:13 p.m, TERRELL COVENS, using **COVENS Target Phone**, called TION NEWTON (call session #936). COVENS told NEWTON that "G" (his supplier) said it was going to be "25" (\$20,500 based on the context of the call) and since NEWTON owed him that "one" (\$1000) it would be 21.5 (\$21,500). NEWTON then asked COVENS if it would be "25" (\$20,500), and COVENS told him it was going to be 20 (\$20,000) plus 500 (\$500). NEWTON then said "plus the 1000" (\$1000) he owed COVENS. COVENS told NEWTON that his supplier was ready now. NEWTON told COVENS that he needed to get the \$1000.

c. At approximately 5:53 p.m, TION NEWTON called TERRELL COVENS on **COVENS Target Phone** (call session #941). NEWTON told COVENS that he did not have "the stack" (\$1000), and he was going to have to wait until tomorrow. COVENS told NEWTON to just bring what they had, and asked NEWTON if he had the "25" (\$20,500). NEWTON said that he had the "20" (\$20,000) but he had to get the "500" (\$500). COVENS told him to just bring it then.

155. On or about March 20, 2006, at approximately 1:25 p.m, TERRELL COVENS, using **COVENS Target Phone**, called TION NEWTON (call session #1087). COVENS asked NEWTON

if he was “on rotation” (selling drugs). NEWTON said he was not. COVENS then asked NEWTON who had the van, and NEWTON replied that he thought "STYLES" (LAVELL COVENS) had it. COVENS asked if he came out to The Square, and NEWTON told him no. COVENS asked if Individual Q was on the rotation in The Square. NEWTON told him yes.

156. On or about March 22, 2006, at approximately 3:10 p.m, TERRELL COVENS, using **COVENS Target Phone**, called TION NEWTON (call session #1228). COVENS asked NEWTON for the phone number of the guy that sells the "dro" (hydroponic marijuana), and explained that they are trying to get some of that "shit" (marijuana). NEWTON told him he would look it up and call him back.

157. On or about April 8, 2006, at approximately 11:15 p.m, TION NEWTON called RONALD TURNER on **TURNER Target Phone** (call session #424). NEWTON told TURNER that the drugs that TURNER had just given NEWTON were a "ball" low (an eighth of an ounce of cocaine too low). TURNER stated that he knew, and that TERRELL COVENS had the other one.

BB. RITA HEMPHILL³⁹

Non-Title III Calls/Seizures

158. On or about November 17, 2005, CPD officers seized crack cocaine from RONALD TURNER and RITA HEMPHILL in HEMPHILL’s apartment in The Square. See ¶32.

³⁹The identification of RITA HEMPHILL in this Affidavit is based on the following: First, law enforcement has been able to identify RITA HEMPHILL’s voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; and because RITA HEMPHILL was identified or identified herself in many of those calls. Second, law enforcement has had conversations with RITA HEMPHILL during which she identified herself.

Title III Calls/ Seizures

159. On or about December 8, 2005, at approximately 10:14 a.m., MARCUS BROWN called RANDALL BREWSTER using **Target Phone One** (call session #495). BROWN told BREWSTER that his people ("UCE2") will be back Friday or Saturday to grab something (drugs). BREWSTER asked BROWN if "RITA" (HEMPHILL) was there in The Square. BREWSTER said that he gave "them" (RITA HEMPHILL and others) "some shit" (drugs) and he needs to get his money back. BREWSTER told BROWN that HEMPHILL owed him "450" (\$450 in drug proceeds) and that it had been two days since RANDALL BREWSTER had given "them" (RITA HEMPHILL and others) "the work" (drugs).

160. At approximately 10:21 a.m., MARCUS BROWN called RITA HEMPHILL using **Target Phone One** (call session #497). BROWN asked HEMPHILL about the "nickels" (\$5 capsules of crack cocaine). HEMPHILL told BROWN that the "nickels" (\$5 capsules of crack cocaine) were gone. BROWN asked HEMPHILL if she had the "450" (\$450 in drug proceeds). HEMPHILL responded that she had "400" (\$400 in drug proceeds). BROWN told HEMPHILL that he wanted to meet her. HEMPHILL refused because she was working selling drugs in The Square. HEMPHILL stated that she did not have "4" (\$400 in drug proceeds) but did have "2" (\$200 in drug proceeds). BROWN asked HEMPHILL to have "ALMONETTA" (HEMPHILL) bring the proceeds to him.

161. At approximately 10:34 a.m., BROWN called RITA HEMPHILL using **Target Phone One** (call session #503). HEMPHILL again discussed the amount of money HEMPHILL owed BROWN from selling drugs in The Square. BROWN told HEMPHILL that he wanted the "200" (\$200) from HEMPHILL that they had previously discussed. HEMPHILL told BROWN that

she had no money to give him. HEMPHILL told BROWN that it was not the right time to talk and that she would call BROWN later.

162. On or about December 9, 2005, at approximately 4:28 p.m., MARCUS BROWN called RITA HEMPHILL using **Target Phone One** (call session #658). During the call, BROWN asked HEMPHILL about the “150” (\$150 in drug proceeds) she owed him. HEMPHILL told BROWN that she had not been outside yet that day, and that “shit ain’t going as fast as you all think it’s going” (HEMPHILL is not able to sell narcotics as quickly as BROWN thinks). BROWN asked HEMPHILL if she was selling “capsules” (capsules containing crack cocaine). HEMPHILL stated that she was working “blows” (heroin). HEMPHILL told BROWN that she was selling drugs somewhere other than The Square. HEMPHILL explained that the money she had previously given BROWN was made from her sale of drugs in a location other than The Square. HEMPHILL stated “look how many days it took us to get there” (it took many days for HEMPHILL to get BROWN the money she owed to him). HEMPHILL told BROWN that she had to “give . . . rocks [crack cocaine] and shit [narcotics], to motherfuckers to let them see how it was and shit.” BROWN complained that HEMPHILL had given “hypes free rock shit”(HEMPHILL had given drug users free crack cocaine). HEMPHILL responded “that’s to build up clientle.”

CC. SHALONDA BROWN⁴⁰

CI/CW Information

163. In the Summer of 2004, CW1 informed law enforcement that SHALONDA BROWN stored firearms and narcotics in her apartment at 1866 S. Karlov in The Square for the COVENS family.

164. In September 2005, CW2 advised law enforcement that while in The Square, CW2 had a conversation with SHALONDA BROWN. BROWN recognized CW2 and they had a short conversation. During that conversation, CW2 observed that BROWN had narcotics on her person and was selling those narcotics in The Square. CW2 also observed BROWN call "FREDDIE MO" (FREDERICK YOUNG) over to BROWN. CW2 saw YOUNG take something out of BROWN's hand and "post back up" (return to the building he was selling drugs out of and to continue selling with the new drugs he had just received from BROWN).

165. In the Fall 2005, CW2 stated that he/she ran into "PUMPKIN" (SHALONDA BROWN) at the 1866 S. Karlov building inside of The Square. CW2 advised that "PUMPKIN" was passing out "jabs" (plastic bags containing smaller packages of narcotics, such as heroin or crack cocaine) to several females inside of The Square. CW2 advised that these "jabs" had 36 rocks of crack cocaine inside of them. CW2 advised that "PUMPKIN" gave three to four "jabs" to each

⁴⁰The identification of SHALONDA BROWN in this Affidavit is based on the following: First, CW1, CW2, and the CI have identified SHALONDA BROWN. Second, law enforcement has been able to identify SHALONDA BROWN's voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; and because SHALONDA BROWN was identified or identified herself in many of those calls with the same alias name ("PUMPKIN" or "BIG P"). Third, during particular intercepted calls, SHALONDA BROWN arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Fourth, law enforcement has identified SHALONDA BROWN in the course of arresting her on at least two occasions in the instant investigation.

female, which CW2 estimated would likely last the females for the night. CW2 advised that he/she saw the females take the “jabs” from "PUMPKIN" and sold them in The Square. Based on his/her past experiences at The Square, CW2 advised that the females would then sell those “jabs” to customers.

166. In February 2006, the CI stated that TREVEL COVENS will sometimes use “PUMPKIN” (SHALONDA BROWN) as a “pack worker” (person who sells drugs) in The Square. The CI advised that SHALONDA BROWN used to “shake up” (mix) the “blows” (heroin) in her apartment for TREVEL COVENS.

Non-Title III Information/Seizures

167. On or about October 21, 2004, CPD conducted a recorded and surveilled controlled purchase of crack cocaine from QUANTA WRIGHT and SHALONDA BROWN in The Square. Surveillance observed QUANTA WRIGHT and SHALONDA BROWN standing in front of the 1856 S. Karlov building in The Square. Both individuals were motioning unknown individuals into the entrance of the 1856 building. A CPD UCO then entered the area and heard QUANTA WRIGHT yelling "blows, blows" (heroin). The UCO then indicated to WRIGHT that he wanted "blows," and WRIGHT pointed in the direction of BROWN. The UCO went in to the hallway of the 1856 building, and observed BROWN holding a clear plastic bag containing foil packets in her hand. BROWN asked the UCO, "how many you want," and the UCO told BROWN "three, three." The UCO handed \$30 in pre-recorded CPD funds to BROWN in exchange for three foil packets of suspect heroin. After the transaction WRIGHT indicated that he had "rocks" (crack cocaine) if the UCO wanted it. The UCO then left the area. The substance in the packets was tested and found to be approximately .6 grams of heroin.

168. On or about March 24, 2005, Cook County Sheriff's Eviction Deputies went to the residence of SHALONDA BROWN, 1866 S. Karlov Avenue, #206, in The Square to enforce a Court ordered eviction. During the course of that eviction, deputies seized approximately 72.2 grams of heroin from SHALONDA BROWN.

a. Upon deputies arrival at SHALONDA BROWN's residence, SHALONDA BROWN answered the door. Deputies advised BROWN of the Court ordered eviction and entered BROWN's apartment. Deputies instructed BROWN to sit down on a couch while they conducted a protective search of the premise. BROWN refused to sit down and stated that she just wanted to leave the premises. Again, deputies ordered BROWN to sit down, at which time she hesitantly complied.

b. While deputies conducted a protective search of the premise, another deputy observed BROWN acting in a nervous manner. Deputies also noticed a large bulge beneath her t-shirt, apparently between her breasts. For officer safety purposes, deputies asked BROWN if she had a weapon hidden under her shirt. BROWN did not reply. When deputies asked BROWN the same question a second time, BROWN responded "no." Deputies instructed BROWN to slowly stand up and pull the bottom of her t-shirt away from her torso. When BROWN complied, deputies observed ten golf ball sized plastic knotted bags and a large quantity of folded United States Currency fall from beneath BROWN's t-shirt.

c. A closer inspection of the items that had fallen from BROWN's t-shirt revealed approximately 230 folded tin foil packets containing a white powder substance believed to be heroin, and \$285 in United States Currency. The substance contained in the folded packets was later tested and found to be approximately 72.2 grams of heroin.

169. On or about May 12, 2005, federal authorities arrested SHALONDA BROWN for the conduct detailed in the preceding paragraph. After arresting BROWN, law enforcement advised her of her rights orally, and in writing. BROWN stated that she understood her rights, and was willing to answer questions without a lawyer present. BROWN also signed the advice of rights form. BROWN subsequently admitted her culpability in the charged offense, and provided information regarding the COVENS's drug operation in The Square. BROWN agreed to cooperate with the FBI in its investigation of the drug operation in The Square, and was released from custody. However, BROWN failed to contact the agents as directed. Since that time, law enforcement has observed BROWN engage in criminal acts in The Square. BROWN's statement to law enforcement on or about May 12, 2005 included the following information regarding the drug operation in The Square, and BROWN's involvement in that operation:

a. BROWN admitted to possessing the 230 packets of heroin seized from her on March 24, 2005. BROWN explained that she was holding the heroin for "Chuck" (Terrence Covens).

b. BROWN advised that she sold and held approximately 10 to 11 "jabs" (bags containing smaller bags that hold narcotics) about three times a week for Terrence Covens. BROWN would also accompany Terrence Covens once or twice a week to pick up drugs from one of Covens's suppliers.

c. BROWN stated that the COVENS family sells "blows" (heroin), "rocks" (crack cocaine), and "weed" (marijuana) in The Square. BROWN stated that those individuals who sell drugs in The Square do so on behalf of, or with explicit permission of, the COVENS family. Persons not selling drugs on behalf of the COVENS family must pay "taxes" to the COVENS

family. According to BROWN, nearly everyone selling drugs in The Square is a member of the NEW BREEDS gang.

170. During the course of the investigation, CPD conducted video surveillance of the drug operation in The Square. On numerous occasions, that surveillance captured SHALONDA BROWN conducting hand-to-hand drug transactions in The Square.

Title III Calls/Seizures

171. On or about February 27, 2006, at approximately 11:37 a.m., SHALONDA BROWN called MARCUS BROWN on **Target One Phone** (call session #11335). SHALONDA BROWN called MARCUS BROWN to determine where he was located. MARCUS BROWN told her he was on 14th and KEELER driving around trying to get some "weed" (marijuana) and trying to "pop some bags off" (sell narcotics). SHALONDA BROWN asked if he was successful, and MARCUS BROWN told her not really. SHALONDA BROWN then told BROWN that she was ready to "roll her shit up" (get her drugs ready).

172. On or about March 3, 2006, at approximately 5:20 p.m., SHALONDA BROWN called MARCUS BROWN on **Target One Phone**. During the conversation BROWN told SHALONDA BROWN that he was in the van with "RELLO" (TERRELL COVENS) taking care of some business. SHALONDA BROWN asked MARCUS BROWN if he had grabbed "that" (narcotics), and BROWN told her he hadn't. SHALONDA BROWN told MARCUS BROWN that she didn't know if she should mess with it. SHALONDA BROWN thinks she should do the "tens" (\$10 dollar bag of narcotics). MARCUS BROWN replied she would get more with the sawbucks (\$10 bag containing crack cocaine). SHALONDA BROWN agreed, and MARCUS BROWN then told her that "they be some little ass capsules" (referring to the size of the capsules containing crack cocaine). SHALONDA BROWN agreed, and MARCUS BROWN asked her how much money she

had to give someone off of that. SHALONDA BROWN replied that she had to give “a deuce” (SHALONDA BROWN would owe \$200 to the person who gave her the drugs). MARCUS BROWN then said “\$150, so that shit is \$75 apiece” (referring to the cost of the drugs).

II. QUANTA WRIGHT⁴¹

Non-Title III Information/Seizures

173. On or about October 21, 2004, CPD conducted a recorded and surveilled controlled purchase of crack cocaine from QUANTA WRIGHT and SHALONDA BROWN in The Square. See ¶167.

174. On or about October 22, 2004, CPD conducted a recorded and surveilled controlled purchased of heroin from WRIGHT in The Square.

a. That day, a CPD UCO observed WRIGHT standing outside of the 1850 S. Karlov building in The Square. The UCO approached WRIGHT, and WRIGHT asked the UCO what the UCO wanted. The UCO said “blow” (heroin). WRIGHT indicated that the UCO should go to the other side of the building. The UCO returned and advised WRIGHT that no one was there. WRIGHT entered the 1856 S. Karlov building in The Square, and later returned in front of the 1850 building. WRIGHT instructed the UCO to go into the hallway of the 1850 building. Once inside, WRIGHT produced a clear plastic bag containing foil packets containing suspect heroin. The UCO handed WRIGHT \$40 in pre-recorded CPD funds in exchange for four foil packets of suspect heroin. The UCO then left the building, advised other CPD officers that the undercover purchase

⁴¹The identification of QUANTA WRIGHT in this Affidavit is based on law enforcement’s photographic identification of QUANTA WRIGHT after a purchase of drugs in which she was involved.

had been completed, and provided the Officers with a description of WRIGHT. The substance inside the packets was tested and found to contain approximately .7 grams of heroin.

b. Shortly thereafter, CPD officers arrived at the 1850 S. Karlov building, where they observed WRIGHT. WRIGHT fled from the Officers, who observed WRIGHT discard a plastic bag containing approximately 37 tin foil packets containing suspect heroin. Shortly thereafter, the Officers detained WRIGHT, who asked what he could do to prevent going to jail. WRIGHT informed officers that he had “rocks” (crack cocaine) in his apartment, located at 1856 S. Karlov, # 302. WRIGHT brought the Officers into WRIGHT’s bedroom, where the Officers recovered one plastic bag, which contained two smaller plastic bags, each of which contained 24 red ziplock bags with suspect crack cocaine. Twenty-seven of the 37 foil packets were tested and found to contain a total of approximately 5.1 grams of heroin. The contents of the remaining 10 packets were not analyzed. Twenty of the 48 red ziplock bags were tested, and found to contain approximately 5.4 grams of cocaine base, in the form of crack cocaine. The contents of the remaining 28 bags were not analyzed. Officers subsequently released WRIGHT.

175. On or about April 15, 2005, a CPD officer spoke with SHALONDA BROWN, who indicated that "RIO" (QUANTA WRIGHT) was holding "work" (narcotics) for TERRELL COVENS in WRIGHT’s apartment, #304 of the 1856 S Karlov building in The Square.

176. On approximately September 13, 2005, CPD officers, conducting video surveillance in “the Square,” observed WRIGHT standing next to KENYATI JORDAN as he conducted suspect narcotic transactions with unknown individuals.

EE. ELGIN CURB⁴²

CW/CI Information

177. In April 2006, the CI advised that CURB started out in The Square working as a “pack worker” (selling narcotics out of the building in The Square) for TERRELL COVENS. CI further stated that CURB moved up to a “pack runner” (transport the narcotics from the supplier to the pack workers).

Non-Title III Information/Seizures

178. On or about August 13, 2005, CPD conducted a surveilled and recorded purchase of crack cocaine from ELGIN CURB and LOUIS EUBANKS in The Square. A CPD UCO entered the 1836 S. Karlov building of The Square. CURB told the UCO that he had “nick caps” (street term for \$5 capsules containing crack cocaine), and asked him if that was what he needed. The UCO told him that he wanted “caps.” CURB told the UCO to wait in the hallway. A moment later, EUBANKS came out with a tape strip containing numerous capsules and began to cut off what people surrounding the UCO were ordering with an orange handled pair of scissors. The UCO told EUBANKS that he wanted “four.” EUBANKS cut off four capsules containing suspect crack cocaine from the strip and gave it to the UCO in exchange for \$20 prerecorded funds. The substance in the capsules were tested and found to be approximately .3 grams of a rocky substance containing cocaine, believed to be cocaine base in the form of crack cocaine. The UCO left and informed his fellow surveillance officers that he had made a controlled purchase from CURB and EUBANKS. CPD Officers approached, detained, and conducted a field interview of EUBANKS and CURB.

⁴²The identification of ELGIN CURB in this Affidavit is based on the following: First, the CI identified ELGIN CURB. Secondly, law enforcement positively identified CURB after conducting a controlled purchase of crack cocaine from him on or about August 13, 2005.

EUBANKS had a small pair of orange handled scissors (scissors are used to cut the packaged narcotics prior to selling to an individual) and a small bundle of United States Currency which contained the \$20 that the UCO used to purchase the narcotics on his person.

179. On or about December 29, 2005, CPD conducted video surveillance in The Square, which captured ELGIN CURB and TERRY COVENS yelling “blows” (heroin) to pedestrians in The Square.

FF. LOUIS EUBANKS⁴³

CI/CW Information

180. In March 2006, the CI viewed a photograph of LOUIS EUBANKS, and was unable to identify him by name, but stated he/she knew him as "PRIDE," and that he used to sell "rocks" (crack cocaine) and "blows" (heroin) in The Square.

Non-Title III Information/Seizures

181. On or about August 6, 2005, a CPD UCO conducted a surveilled and recorded purchase of crack cocaine from LOUIS BANKS. The UCO approached the 1830 S. Karlov building in The Square. EUBANKS asked the UCO what type of drug he wanted to purchase. The UCO told EUBANKS that he wanted “3 blows” (heroin). The UCO handed EUBANKS \$30, who told an unknown male (“UM4”) to get the heroin for the UCO. UM4 left the area and returned with foil packets containing suspect heroin. The UCO then left The Square.

182. On or about August 13, 2005, CPD conducted a surveilled and recorded purchase of crack cocaine from ELGIN CURB and LOUIS EUBANKS in The Square. *See ¶178.*

⁴³The identification of LOUIS EUBANKS is based on the following: First, the CI has identified EUBANKS as a person who sold crack cocaine and heroin in The Square. Second, law enforcement has identified EUBANKS through recorded conversations in August 2005.

GG. SAMUEL HARRIS⁴⁴

CW/CI Information

183. In February 2006, the CI informed law enforcement officers that HARRIS worked for LAVELL COVENS and "runs" the crack cocaine for him inside The Square.

Non-Title III Information/Seizures

184. On approximately December 31, 2005, CPD officers entered the 1856 S. Karlov building in The Square and observed SAMUEL HARRIS, SHANTA JAMES, and LONNIE GRIFFIN standing in the hallway. Officers conducted a consensually recorded field interview with these individuals. While the interview was being conducted, one of the interviewing officers recovered a clear plastic bag containing 5 yellow zip lock bags of suspected crack cocaine from inside of a vent in the common area, immediately adjacent to where all subjects had been standing prior to the interview. The Officers then searched HARRIS, and found him to be in possession of \$230 in United States Currency. During the interview, HARRIS admitted that he had been selling the suspect narcotics that had been found in the vent to make extra money for himself. The substance inside one of the 5 bags was tested and found to be approximately .1 gram of chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine.

Title III Calls/Seizures

185. On February 19, 2006, at approximately 11:18 p.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS at (call session # 9866). BROWN asked HARRIS

⁴⁴The identification of SAMUEL HARRIS in this Affidavit is based on the following: First, the CI has identified SAMUEL HARRIS. Second, law enforcement has identified HARRIS, and his voice through recorded conversations during controlled purchases of narcotics from HARRIS. Third, in intercepted conversations, SAMUEL HARRIS has identified himself and has been identified by others by his name or nickname ("SAM").

how many “bags” (of narcotics) he had left. HARRIS stated that he had a couple left. BROWN told HARRIS that "DON" (ADONIS HOUSE) was looking for those bags.

186. On February 20, 2006, at approximately 9:55 a.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS (call session #9929). BROWN asked HARRIS if he had finished yet, to which HARRIS replied that no one was outside. BROWN asked why, and HARRIS told him that he didn't know. BROWN explained that he was on his way down, and HARRIS asked if BROWN would be outside. HARRIS then told BROWN that the police keep running “up in here” (in The Square), and that no one is outside. BROWN asked HARRIS if he had “a whole jab” (a bag containing smaller bags or capsules of narcotics) and HARRIS replied that he did not. BROWN then told HARRIS that he would be there in 20 minutes.

187. On February 20, 2006, at approximately 12:47 p.m., KENDALL BREWSTER, using **Target Phone One**, called SAMUEL HARRIS (call session #9968). BREWSTER asked HARRIS if he was almost finished with "that" (referring to the remainder of the jab that he had left to sell), and if he had about “200” (\$200). HARRIS stated that he had already given him “a deuce” (\$200) already, and that was what he had owed him, “a deuce” (\$200).

188. On February 21, 2006, at approximately 8:11 p.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS (call session #10174). BROWN asked HARRIS “how many” (narcotics) he had left. HARRIS stated that he was finished selling, and BROWN told him he would "slide on" (meet) him in a minute.

189. On March 16, 2006 at approximately 10:08 p.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS (call session #15102). BROWN told HARRIS to find out how many packs of capsules (capsules containing crack cocaine) that "FRO FRO" (LAMONT HARRIS) had and to call him back.

HH. SHAUN JAMES⁴⁵

CW/CI Information

190. In February 2006, the CI informed law enforcement that "BRISCO" (SHAUN JAMES) sells "blows" (heroin) for "MOOK" (TREVEL COVENS). In March 2006, the CI advised law enforcement that SHAUN JAMES holds "packs" (packages that contain heroin) for "MOOK" (TREVEL COVENS) in his JAMES's apartment, #302, inside of The Square.

Non-Title III Information/Seizures

191. On approximately March 5, 2005, while conducting a field interview, CPD officers observed SHAUN JAMES exit a vehicle and shove a large balled item into his groin area, which was believed to be possible illegal contraband. Officers asked JAMES to reveal what was in his hand, and he complied pulling out a large bundle of U.S. Currency. JAMES then asked to speak with one officer who he informed that only \$500 of the \$1500 was his. He relayed that he was eventually headed to take the money to The Square, but did not want to tell the officer to whom the money was being delivered. JAMES then offered to get some "work" (illegal narcotics) and maybe "gun" if the officer would let him go with the money. JAMES attempted to contact a number of people in an effort to locate narcotics or a firearm, but was unsuccessful in his attempts. The Officers returned the money to JAMES and released him.

⁴⁵The identification of SHAUN JAMES in this Affidavit is based on the following: First, the CI has identified SHAUN JAMES. Second, law enforcement has been able to identify SHAUN JAMES's voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; and because SHAUN JAMES was identified or identified himself in many of those calls with the same name or alias name ("BRISCO"). Third, law enforcement has had conversations with SHAUN JAMES during which SHAUN JAMES has identified himself.

192. On or about January 31, 2006, CPD officers seized heroin from the apartment of SHANTA and SHAUN JAMES. SHANTA JAMES subsequently identified KENYATI JORDAN as the supplier of the heroin. *See* ¶125.

Title III Calls/Seizures

193. On March 6, 2006, at approximately 4:17 p.m. DAVID HARRIS, using **Target One Phone**, called SHAUN JAMES (call session #12806). HARRIS asked JAMES if he is ready for him. JAMES asked him if he had something for him, and HARRIS said he was going to call "STYLES" (LAVELL COVENS) now and tell him to meet JAMES in the back lot of The Square. JAMES told him no, and then said that he wanted to know where "BIG P" (SHALONDA BROWN) got her "stuff" (drugs). HARRIS told JAMES that she did not get it from "SAM" (SAMUEL HARRIS), and that she probably got them from Individual Q.

194. On March 7, 2006, at approximately 9:17 a.m., MARCUS BROWN using **Target Phone One** called SHAUN JAMES (call session #12909). BROWN told JAMES that he was in "the lot" (the parking lot of The Square). JAMES told BROWN to come to the front of the building (in The Square) because JAMES had "150" (\$150) for him.

II. SHANTA JAMES⁴⁶

CW/CI Information

195. In February 2006, the CI informed law enforcement officers that SHANTA JAMES sells "capsules" (capsules containing crack cocaine) for TERRELL COVENS.

⁴⁶The identification of SHANTA JAMES in this Affidavit is based on the following: First, the CI has identified SHANTA JAMES. Secondly, law enforcement has had conversations with SHANTA JAMES during which SHANTA JAMES has identified herself.

Non-Title III Information/Seizures

196. On or about October 7, 2005, CPD conducted a recorded and surveilled controlled purchase of crack cocaine from KENNETH STARKS and SHANTA JAMES in The Square. *See* ¶130.

197. On or about October 20, 2005, CPD seized crack cocaine from SHANTA JAMES and TION NEWTON. *See* ¶153.

198. On or about January 31, 2006, CPD officers seized heroin from the apartment of SHANTA and SHAUN JAMES. SHANTA identified KENYATI JORDAN as the supplier of the heroin. *See* ¶125.

Title III Conversations/Seizures

199. On January 31, 2006, at approximately 12:39 p.m., SHALONDA BROWN using **Target Phone One** had a conversation with an unknown male (“UM3”) regarding the seizure of heroin from SHANTA JAMES that same day. SHALONDA BROWN told UM3 that the police had “Miss JAMES’s shit” (the police found SHANTA JAMES’s drugs). SHALONDA BROWN said that The Square is “heated up” (that the police were active in the Square).

JJ. FREDERICK YOUNG⁴⁷

CW/CI Information

200. In February 2006, the CI advised law enforcement that “FRED MO” (FREDERICK YOUNG) was a “pack worker” (salesperson of drugs) for the COVENS family in The Square.

⁴⁷The identification of FREDERICK YOUNG is based on the following: First, the CI has identified YOUNG. Second, law enforcement has identified YOUNG, and his voice through recorded conversations during controlled purchases of narcotics from YOUNG. Third, FREDERICK YOUNG has identified himself and has been identified by others by his name or nickname (“FREDDIE MO”)

Non-Title III Information/Seizures

201. In August and October 2005, CPD officers working in an undercover capacity made three separate recorded and surveilled controlled purchases of narcotics from FREDERICK YOUNG in The Square.

a. On or about on August 12, 2005, CPD observed FREDERICK YOUNG conducting hand-to-hand drug transactions with unknown individuals in The Square. A CPD UCO entered the courtyard. YOUNG approached the UCO and asked him what he wanted. The UCO stated that he wanted "blows"(heroin). YOUNG asked him how many he wanted. The UCO said "four." The UCO and YOUNG entered the 1860 S. Karlov building in The Square. Once inside, the UCO observed YOUNG walk down the hallway and out of sight. YOUNG then reappeared and gave UCO a piece of tape, containing four foil packets containing suspect heroin. The UCO handed YOUNG \$40 in pre-recorded CPD funds as payment for the suspect heroin. Law enforcement officers subsequently conducted a field interview of YOUNG, and recovered \$490 from him, \$40 of which were the pre-recorded CPD funds used by the UCO to purchase the suspect heroin. The substance inside of one of the bags was tested and found to be approximately .1 gram of heroin.

b. On or about on October 1, 2005, CPD conducted a controlled narcotics purchase from YOUNG in the area of the 1866 S. Karlov building in The Square. Officers observed YOUNG conducting hand-to-hand drug transactions with unknown individuals. A CPD UCO, utilizing a consensual overhear, then approached YOUNG and asked for "rocks" (crack cocaine). YOUNG then walked into the hallway of the 1866 building, and retrieved a clear plastic bag, containing numerous zip lock bags containing a white substance from the top of an entranceway. YOUNG removed one clear ziplock bag and handed it to the UCO in exchange for \$20 of pre-recorded CPD funds. The substance inside of the ziplock bag was tested, and found to be

approximately .4 grams of a chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine.

c. On or about on October 29, 2005, CPD officers observed YOUNG holding a clear plastic bag containing yellow zip lock bags of suspected narcotics, counting money, and conducting hand-to-hand drug transactions with unknown individuals in The Square. A CPD UCO entered the courtyard, approached YOUNG, and asked him for "batman" (street term for \$10 bags of crack cocaine). UCO asked YOUNG for a deal if he spent \$100, and YOUNG told him, "I can't do that, I'll get you later on." UCO handed YOUNG \$100 of CPD pre-recorded funds, in exchange for ten zip lock bags with batman decals that contained suspect crack cocaine. The substance inside of the bags were tested and found to contain approximately 2.0 grams of a chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine.

Title III Calls/Seizures

202. During the investigation, criminally pertinent calls were intercepted in which co-conspirators and YOUNG discussed YOUNG's distribution of narcotics in The Square:

a.. On or about on February 4, 2006, at approximately 4:33 p.m., SHALONDA BROWN called MARCUS BROWN on **Target Phone One** (call session # 6718). SHALONDA BROWN asked MARCUS BROWN where FREDDY MO (FREDERICK YOUNG) was located. YOUNG then got on the phone and SHALONDA BROWN asked him if he wanted money, and stated that she had something for him if he wanted some of it. YOUNG told her that he did want money. SHALONDA BROWN told him that she was currently in "the Bricks" (The Square). SHALONDA BROWN told YOUNG to watch "BRISCO" (SHAUN JAMES) because he had the next shift at The Square.

c. On or about on March 10, 2006, at approximately 11:12 p.m., SAMUEL HARRIS, using **Target Phone One**, called FREDERICK YOUNG (call session # 13791). HARRIS asked YOUNG if he had finished selling narcotics, and whether he had more “capsules” (capsules containing crack cocaine). YOUNG told him that he had two more packs left.

KK. PRENTICE EARL⁴⁸

CW/CI Information

203. In February 2006, the CI informed law enforcement that several of the COVENS family members use “BODIE” (PRENTICE EARL), as a pack worker in The Square. In March 2006, the CI stated that EARL was currently incarcerated, but had primarily sold “blows” (heroin) in The Square prior to his incarceration. CPD and Illinois Department of Corrections records reflect that EARL has been incarcerated since February 28, 2006 on an unrelated violation of his parole.

Non-Title III Conversations/Seizures

204. On February 9, 2006, CPD officers, conducting surveillance in The Square, entered the 1856 building, and once in the hallway, observed Individual N and PRENTICE EARL run up the stairs of the structure to the third floor, where both subjects were stopped for questioning. An officer observed a clear plastic bag containing numerous clear plastic capsules believed to be crack

⁴⁸The identification of PRENTICE EARL is based on the following: EARL’s voice was intercepted on wire communications, and during the course of this investigation, CPD officers had an in-person conversation with EARL, in which EARL was identified, and his telephone number was obtained. Following that in-person conversation, the interviewing officer reviewed recorded conversations of an individual tentatively identified as “BODIE.” The officer confirmed the voice identification, and based on EARL’s interview, confirmed that “BODIE” was a street name for EARL. Additionally, during this in-person interview, EARL provided his telephone number to the interviewing officers. This number is associated with some calls wherein EARL’s voice is intercepted.

cocaine on the ground in between Individual N and EARL. The Officers, role-playing as corrupt officers, had a discussion with EARL regarding his drug activity in The Square. EARL identified his alias as “BODIE,” and advised that the narcotics in the plastic bag were his. EARL further advised the Officers that he (EARL) usually purchased “packs” (bags containing narcotics) from whomever is working in The Square. EARL stated that he obtains those “packs” at a discounted price, and then resells them at a higher price. Subsequent analysis of the capsules indicated that they contained approximately 1.5 net grams of cocaine base, in the form of crack cocaine.

Title III Calls/Seizures

205. On January 27, 2006, at approximately 11:50 p.m., PRENTICE EARL called MARCUS BROWN on **Target Phone One** (call session #5336). EARL asked BROWN if he was “still down” (had drugs available for sale). BROWN replied “for sure.” EARL asked BROWN if he could get “35 for 3” (35 pills believed to contain ecstasy or crack cocaine for \$300). BROWN stated that he did not know if he (BROWN’s supplier) had “35” (35 pills believed to contain ecstasy or crack cocaine), or if he even had “30” (30 pills believed to contain ecstasy or crack cocaine). BROWN told EARL that he was going to see (if he could get EARL the drugs) and would call EARL back.

206. On January 27, 2006, at approximately 11:58 p.m., PRENTICE EARL called MARCUS BROWN on **Target Phone One** (call session #5350). When BROWN answered the phone, he advised EARL that he had some company in his “crib” (residence) and he was trying to wait, but that he was going to count the drugs right now. EARL told BROWN that he was in a rush because he had to go back out there to sell drugs. EARL then asked BROWN if he (EARL) could come to “the Bricks” (The Square) or if EARL should meet BROWN on “Roosevelt” (Road in Chicago). BROWN instructed EARL to come to “the Bricks” (The Square).

207. On January 29, 2006, at approximately 7:00 p.m., PRENTICE EARL called MARCUS BROWN on **Target Phone One** (call session #5647). After having a discussion regarding where BROWN was located, BROWN asked EARL what he was trying to get (what drugs EARL wanted to purchase). EARL responded by saying “sawbuck” (\$10 bags of crack cocaine). BROWN asked, 10 of them, and EARL replied yes, but then indicated that he wanted “15 for the one three” (15 bags of crack cocaine for \$130).

208. On January 29, 2006, at approximately 7:56 p.m., MARCUS BROWN called PRENTICE EARL using **Target Phone One** (call session #5659). BROWN asked, “you wanted 10 [of a quantity of narcotics] right?” EARL responded in the affirmative. BROWN stated, “he” (the supplier) is saying 150 but he’ll do something for you for 125 (the supplier offered to sell a quantity of crack cocaine for \$150 but reduced the price to \$125). There is then a discussion about how EARL will get to BROWN’s residence. BROWN then asked, “10 [of a quantity of narcotics] for the 125 [\$125] is cool, right?” EARL responded in the affirmative. BROWN then stated “he” (the supplier) was not going to be there very long, and EARL indicated that he would come to BROWN’s residence right away.

LL. JERMAINE HARRIS⁴⁹

Title III Calls/Seizures

209. During the course of the investigation, several criminally pertinent calls were intercepted establishing HARRIS' role in this conspiracy. For example:

a. Or about February 24, 2006, JOHNEAK JOHNSON, JERMAINE HARRIS and MARCUS BROWN had a series of conversations regarding drug sales in The Square. *See* ¶134.

b. On February 26, 2006, at approximately 10:47 p.m., JERMAINE HARRIS called BROWN on **Target One Phone** (call session #11296). HARRIS asked BROWN if he wanted him to "work it" (sell drugs). BROWN told HARRIS that he thought he had finished selling the drugs, but HARRIS informed BROWN that he was not finished because he had "been up north for the weekend." BROWN asked HARRIS what drugs he had, and HARRIS replied that he still had his "jab" (strip of capsules containing crack cocaine). BROWN asked HARRIS if he had a whole one, and HARRIS told him that he did have a whole one and that he wanted to sell it in the morning. BROWN told him to go ahead and sell the drugs.

c. On February 27, 2006, at approximately 10:28 a.m., BROWN called JERMAINE HARRIS using **Target One Phone** (call session #11331). BROWN asked HARRIS if he had a whole "24" (strip of 24 capsules containing crack cocaine), and HARRIS replied that he only had "22" (strip of 22 capsules containing crack cocaine). BROWN then told HARRIS to bring it to The Square).

⁴⁹The identification of JERMAINE HARRIS in this Affidavit is based on the following: First, law enforcement has been able to identify JERMAINE HARRIS's voice because that voice has been intercepted numerous times, particularly on **Target Phone One**; and because JERMAINE HARRIS was identified or identified himself in many of those calls with the same name.

MM. DAVID HARRIS⁵⁰

CI/CW Information

210. In March 2006, the CI informed law enforcement that DAVID HARRIS will either sell narcotics for LAVELL COVENS or for TION NEWTON, who sell "sawbucks" (\$10 packages of crack cocaine) in The Square.

Non-Title III Information/Seizures

211. On or about March 24, 2006, CPD officers sought and obtained consent from Individual O to search her apartment, 1856 S. Karlov, #201, in The Square. During the search of a bedroom belonging to DAVID HARRIS, officers recovered the following: 1) 4 clear knotted plastic bags containing a total of approximately 96 clear capsules containing a white rock substance, believed to be crack cocaine; 2) a clear plastic bag containing approximately 35 tin foil packets containing a white powder substance, believed to be heroin; 3) a clear plastic bag containing approximately 14 ziplock bags with a green plant substance, believed to be marijuana; and 4) \$455 in United States Currency. HARRIS was arrested and advised of his rights. The substances in 63 of the clear capsules containing the suspect crack cocaine were tested and found to be approximately 5.1 grams of chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine. The substance in 16 of the foil packets were tested, and found to be approximately 5.4

⁵⁰The identification of DAVID HARRIS is based on the following: First, the CI has identified HARRIS as a person who sells narcotics for LAVELL COVENS and TION NEWTON in The Square. Second, law enforcement have identified HARRIS through interviews with co-conspirators as well through his arrest on March 24, 2006. Third, HARRIS has identified himself in calls that were intercepted during this investigation and because that voice was consistently associated with the same phone number.

grams of heroin. The substance in the 14 ziplock bags containing suspect marijuana were tested and found to be a total of approximately 11.7 grams of marijuana.

Title III Calls/Seizures

212. During the course of the investigation several criminally pertinent conversations were intercepted where HARRIS spoke about the drug operation in The Square:

a. On or about February 12, 2006, at approximately 5:43 p.m., MARCUS BROWN, using **Target Phone One**, called DAVID HARRIS (call session #8485). BROWN asked HARRIS if he had any “weed” (marijuana). HARRIS replied that “RELL” (TERRELL COVENS) had some “liquid dro” (organically grown marijuana). HARRIS also told BROWN that he could obtain marijuana from “Bone” (true name unknown) in The Square. HARRIS ended the call by saying, “One” (a sign of loyalty among the NEW BREED gang).

b. On or about March 9, 2006, at approximately 9:40 p.m. MARCUS BROWN received an call on **Target Phone One** from DAVID HARRIS (call session #13560). BROWN asked HARRIS if the law enforcement personnel had left the area. HARRIS told BROWN that he thought they were in the back lot The Square. BROWN asked HARRIS what he had left on the “caps” (crack cocaine). HARRIS told BROWN that he had “6 of them” (6 of a quantity of crack cocaine).

c. On or about March 14, 2006, at approximately 10:53 p.m. MARCUS BROWN, using **Target Phone One**, called DAVID HARRIS (call session #14668). HARRIS warned BROWN about the police presence inside of The Square. BROWN told HARRIS that there are “7 slick boys (police) standing right in front of him.” BROWN told HARRIS that he had just sold “40 dollar rocks” (quantity of crack cocaine) to a customer.

d. On or about March 14, 2006, at approximately 11:01 p.m. MARCUS BROWN, using **Target Phone One**, called DAVID HARRIS (call session #14679). HARRIS asked BROWN if he was “good” (pertaining to the narcotics sales in The Square). BROWN replied, “Hell no, I’m finna get the fuck on, shut the shit down” (ending the narcotics shift in The Square for the night).

NN. DONRIE ROBINSON⁵¹

CI/CW Information

213. In March 2006, the CI informed law enforcement that DONRIE ROBINSON is a “pack worker” who sells narcotics in The Square for the COVENS family.

Non Title III Information/Seizures

214. On or about January 15, 2005, CPD officers conducted surveillance at the 1850 S. Karlov building in The Square. Upon entering the rear of the building, officers observed ROBINSON clutching a clear plastic bag in his hand. Officers asked ROBINSON what was in his hand. ROBINSON responded “I have work [narcotics] on me” and opened his right hand. Officers observed a clear plastic bag containing numerous ziplock bags containing a white, rock-like substance, believed to be crack cocaine. Officers seized the large clear plastic bag and asked ROBINSON if he had any more narcotics in his possession. ROBINSON stated “I have some weed [marijuana] and more work [narotics] in my pocket.” Officers searched ROBINSON and recovered approximately additional ziplock bags containing suspected crack cocaine and approximately 49 bags containing suspected marijuana. In total, officers recovered approximately 36 plastic bags

⁵¹The identification of DONRIE ROBINSON in this Affidavit is based on the following: First, the CI has identified DONRIE ROBINSON. Second, law enforcement has photographically identified DONRIE ROBINSON after a purchase of narcotics in which DONRIE ROBINSON was involved.

containing suspect crack cocaine. ROBINSON stated that "BULO" (CALVIN MCWRIGHT) gave ROBINSON the narcotics. ROBINSON explained that MCWRIGHT comes to The Square every morning between 6 a.m. and 9 a.m. to pass out narcotics to the workers who sell narcotics in The Square. The substance in 29 of the plastic bags containing the suspect crack cocaine were tested and found to be approximately 5.2 grams of cocaine base, in the form of crack cocaine. The substance in 20 of the bags containing suspect marijuana were tested, and found to be approximately 30.4 grams of marijuana.

OO. RODNEY WILLETT⁵²

CI/CW Information

215. In March 2006, CI viewed a photograph of RODNEY WILLETT and was unable to identify him by name, but stated he/she knew him and that he used to "sell rocks" (crack cocaine) in The Square.

Non-Title III Information/Seizures

216. On or about January 11, 2005, CPD officers observed RODNEY WILLET conducting hand-to-hand drug transactions with unknown individuals inside of The Square. CPD officers approached WILLETT, who was holding a clear plastic bag containing numerous tin foil packets of suspect heroin. Law enforcement seized that bag and conducted a search of WILLETT, which resulted in the seizure of a clear plastic bag containing 48 clear capsules containing suspect crack cocaine, and \$757 in United States Currency. The substance in 15 of the foil packets was

⁵²The identification of RODNEY WILLETT is based on the following: First, the CI has identified RODNEY WILLET. Second, law enforcement have identified RODNEY WILLET through interviews with him. Third, law enforcement has been able to identify RODNEY WILLETT's voice because RODNEY WILLETT has identified himself in calls that were intercepted during this investigation.

tested, and found to contain approximately 5.3 grams of heroin. The substance in the capsules was tested, and found to contain approximately 4.1 grams of chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine.

217. On or about April 4, 2006, CPD officers seized an undetermined amount of heroin and two firearms in The Square in an incident involving TREVEL COVENS, TERRY COVENS, Individual N, RODNEY WILLET, and LEVELL HICKS. *See* ¶43.

Title III Calls/Seizures

218. During the course of the investigation, several criminally pertinent calls were intercepted in which co-conspirators discussed WILLET'S role in the conspiracy.

a. On or about March 22, 2006, at approximately 5:38 p.m., TREVEL COVENS called TERRELL COVENS on **COVENS Target Phone** (call session #1254). TERRELL COVENS asked TREVEL COVENS if he was still "running the shift" in The Square. TREVEL COVENS responded in the affirmative. TERRELL COVENS told TREVEL COVENS to tell RODNEY WILLETT that he did not give him the "Louie Banks" (believed to be money or narcotics) and that TERRELL was going to pay for it.

b. On or about March 28, 2006, at approximately 3:32 p.m., TERRELL COVENS, using **COVENS Target Phone**, called RODNEY WILLETT (call session #1560). COVENS asked WILLETT to "slide to the Bricks" (The Square), because he needed some narcotics.

PP. KENNETH SYKES⁵³

Non-Title III Information/Seizures

219. On or about October 5, 2005, CPD conducted a recorded and surveilled controlled purchase of crack cocaine and heroin from LEVELL HICKS, KENNETH SYKES, and ALMONETTA HEMPHILL. *See* ¶120.

220. On or about on October 11, 2005, CPD officers conducted video surveillance of The Square, which captured KENNETH SYKES holding suspected narcotics in his hand and conducting hand-to-hand drug transactions with unknown individuals.

221. On or about April 18, 2006, CPD officers observed SYKES conducting hand-to-hand drug transactions at 1836 S. Karlov Avenue, Chicago in The Square. CPD officers approached SYKES to conduct a field interview. SYKES looked in the direction of the CPD officers and, began to walk away from them, despite repeated requests from the officers to stop walking. CPD officers observed SYKES throw a clear plastic bag containing smaller ziplock baggies containing suspect crack cocaine to the ground. CPD officers recovered the ziplock baggies and detained SYKES. During a custodial search of SYKES, officers found an additional two clear plastic baggies in SYKES's right front pants pocket containing suspect crack cocaine.

⁵³The identification of KENNETH SYKES in this Affidavit is based on law enforcement's identification of him through interviews and recorded conversations with SYKES.

QQ. HERBERT ROBINSON⁵⁴

Non-Title III Information/Seizures

222. On or about August 17, 2005, CPD conducted a surveilled and recorded purchase of heroin from HERBERT ROBINSON. On that date, surveillance captured ROBINSON walking back and forth from the 1850 S. Karlov building to the 1846 S. Karlov building in The Square. A CPD UCO approached ROBINSON, and then entered the 1846 building with ROBINSON. While inside, the UCO purchased two tin foil packets containing suspect heroin from ROBINSON with \$40 in pre-recorded CPD funds. CPD officers subsequently conducted a field interview with ROBINSON, and recovered \$30 of the \$40 in prerecorded funds from ROBINSON. Subsequent analysis of the contents of one of the tin foil packets indicated that it contained .1 gram of heroin.

Title III Calls/Seizures

223. During the course of the investigation several phone calls were intercepted in which co-conspirators spoke about ROBINSON'S role in the conspiracy:

a. On or about March 11, 2006, MARCUS BROWN, using **Target Phone One**, called RONALD TURNER (call session #13826). BROWN told TURNER that he "was cool" (regarding narcotics) and that he was going to wait until tomorrow. BROWN told TURNER that he would come out early at 6 to work the narcotics shift in The Square. TURNER asked BROWN, "who you gonna give that to (regarding narcotics)?" BROWN replied, "shit, ain't nobody ever gave that to me" (narcotics). HERBERT ROBINSON then got on BROWN's phone and identified

⁵⁴The identification of HERBERT ROBINSON is based on the following: First, law enforcement has identified ROBINSON through interviews with ROBINSON. Third, HARRIS has identified himself as HERB in calls that were intercepted during this investigation.

himself as "HERB." TURNER told HERB to give the narcotics to BROWN. HERB replied "10-4, 10-4," and asked TURNER "you got me though" (making sure that TURNER will have either narcotics or money for him). TURNER replied, "yes." When BROWN got back on the phone, TURNER asked him if he "was straight" (if he had the narcotics in order). BROWN replied, "yes."

b. On or about March 19, 2006, while speaking to TERRELL COVENS, LAMONT HARRIS identified HERBERT ROBINSON as one of the individuals selling drugs in The Square. *See* ¶148.

RR. IVAN WHITE⁵⁵

Non-Title III Information/Seizures

224. On or about on October 15, 2004, CPD officers arrived at The Square and observed WHITE run into the 1856 S Karlov building. Officers followed WHITE up the stairwell and observed him place an item on top of duct work on the third floor landing. WHITE looked in the direction of the officers and continued to run down the hallway where he was ultimately detained. Officers then recovered a plastic bag containing 41 ziplock bags containing suspect crack cocaine from the top of the duct work on the third floor landing. WHITE told the officers that he sells narcotics for an unknown black male, who uses the name "K.J.", and that he (WHITE) needed to make some extra money for himself. WHITE was also found in possession of \$80 which was not confiscated. The substance inside 27 of the bags was tested and found to be approximately 5.2 grams of cocaine base, in the form of crack cocaine.

225. On or about February 8, 2006, CPD officers were conducting surveillance in The Square. As the Officers approached IVAN WHITE, WHITE fled. Officers pursued WHITE and

⁵⁵The identification of IVAN WHITE in this Affidavit is based on law enforcement's identification of him through interviews and recorded conversations of WHITE.

detained him. During this detention, the Officers, in their capacity as ruse officers, had a recorded conversation with WHITE in the 1856 S. Karlov building of The Square. WHITE related that he was in The Square selling narcotics because times were hard. WHITE told the Officers that he had been selling “dub rocks” (\$20 bags of crack cocaine) since about 9:00 that morning. Initially, WHITE told the officers that the “dubs” came from an unknown female, but later admitted that the crack cocaine belonged to “BAY BAY” (LAVELL COVENS). WHITE told the officers that he had approximately \$90 of his crack cocaine sales on his person. Officers released WHITE without seizing the currency.

SS. JACQUELINE HOLMAN⁵⁶

226. On or about October 1, 2005, CPD conducted video surveillance in The Square, which captured JACQUELINE HOLMAN yelling "blows" (heroin), selling narcotics to an unidentified male inside of a building in The Square, exiting the building, and then counting suspected drug proceeds in her hand.

227. On or about November 12, 2005, CPD conducted a surveilled and recorded purchase of crack cocaine from SALVATORE BASS and JACQUELINE HOLMAN.

a. A CPD UCO observed BASS inside the courtyard of The Square with JACQUELINE HOLMAN. The UCO walked with BASS and HOLMAN from the Courtyard in The Square to the hallway of the 1836 S. Karlov building. HOLMAN explained that she was taking the undercover officer to the “big man.” BASS identified the “big man” as “TERRY” (believed to be

⁵⁶The identification of JACQUELINE HOLMAN in this Affidavit is based on the following: the undercover officer who purchased crack cocaine from HOLMAN and SALVATORE BASS on November 12, 2005, identified a photograph of JACQUELINE HOLMAN as the woman from whom he had purchased crack cocaine on that date.

TERRY COVENS). HOLMAN left the area for a short period of time, leaving the UCO with BASS in the hallway.

b. While in the hallway, BASS asked the UCO if he wanted a “whole jab” (a bag which contains smaller bags of crack cocaine). The UCO asked how many smaller bags of crack cocaine were in a jab. BASS responded “22 [22 smaller bags] . . . 24 [24 smaller bags].” BASS offered to get the UCO 4 smaller bags of cocaine for free if the undercover officer bought 20 smaller bags of crack cocaine. The undercover officer ultimately negotiated a deal to purchase 22 smaller bags of crack cocaine for \$200.

c. After the conversation with BASS, HOLMAN returned to the hallway, and provided the undercover officer, in the presence of BASS, with a clear plastic bag containing numerous yellow and black ziplock bags, bearing a “Batman” logo, containing a white rocky substance, believed to be crack cocaine. HOLMAN told the undercover officer that the bag contained two free smaller bags of crack cocaine. The undercover officer provided HOLMAN with \$200.

d. Upon completing the transaction, at approximately 8:53 a.m., surveillance observed the undercover officer leaving the courtyard of The Square. At the same time, surveillance observed TERRY COVENS conversing with HOLMAN and BASS in the courtyard of The Square.

TT. SALVATORE BASS⁵⁷

CI/CW Information

⁵⁷The identification of SALVATORE BASS in this Affidavit is based on the following: First, an undercover officer identified a photograph of BASS from a photo line-up as the person from whom he purchased crack cocaine on or about November 12, 2005. Second, in February 2006, the CI identified a photograph of BASS as an individual s/he knows as “KOJACK.”

228. In February 2006, the CI advised law enforcement that “KOJACK” (SALVATORE BASS) resides in an apartment on the second floor of the 1830 S. Karlov building. According to the CI, “Kojack” holds the position of “security” (meaning that BASS helps protect the COVENS’s drug operation in The Square and notifies the workers of the presence of police or adversaries in The Square).

Non-Title III Information/Seizures

229. On or about November 12, 2005, CPD conducted a surveilled and recorded purchase of crack cocaine from SALVATORE BASS and JACQUELINE HOLMAN. See ¶227.

UU. LONNIE GRIFFIN⁵⁸

Non-Title III Information/Seizures

230. On or about October 20, 2004, CPD ruse officers observed GRIFFIN conducting hand-to-hand narcotic transactions at the 1850 S. Karlov building in The Square. The Officers observed GRIFFIN place a clear plastic bag containing numerous shiny objects inside of a bag into a hole in the ceiling. The Officers approached GRIFFIN to conduct a field interview. GRIFFIN pushed the Officers aside, and fled from the building. The Officers chased GRIFFIN, and took him into custody near 16th Street and Keeler Avenue. GRIFFIN's relative, Individual I, approached the officers wanted to know what she could do for GRIFFIN. Individual I gave the Officers two firearms: 1) .22 Caliber semi-automatic firearm; and 2) one semi-automatic pistol. The Officers also recovered the bag that GRIFFIN had placed in the hole of the ceiling of the 1850 building. The bag

⁵⁸The identification of LONNIE GRIFFIN is based on the following: First, the CI has identified LONNIE GRIFFIN. Second, law enforcement has identified GRIFFIN through interviews with GRIFFIN.

contained numerous foil packets containing suspect heroin. GRIFFIN admitted that the narcotics and the guns Individual I provided to officers belonged to him.

231. On or about December 29, 2005, CPD officers saw GRIFFIN conducting hand-to-hand drug transactions in The Square. More specifically, the Officers observed GRIFFIN retrieve small items, believed to be narcotics, from the top of the door of the 1866 S. Karlov building in The Square, and give those items to unknown pedestrians in exchange for money. A short time later, CPD "ruse officers" attempted to conduct a field interview with GRIFFIN, however GRIFFIN fled on foot. The Officers apprehended GRIFFIN near the same door from which GRIFFIN had been operating. The Officers seized 14 yellow tinted zip lock bags of suspect crack cocaine from the top of the door, and \$180 in United States Currency from Griffin. The substance in the bags was tested and found to be approximately 2.8 grams of a chunky substance containing cocaine, believed to be cocaine base in the form of crack cocaine.

VV. OCTAVIA LOGAN⁵⁹

Non-Title III Information/Seizures

232. On or about December 28, 2005, CPD officers conducted video surveillance, which captured LOGAN with narcotics in her hand after entering and exiting the 1866 S. Karlov building of The Square with two unknown individuals.

233. On or about January 31, 2006, CPD officers conducting video surveillance inside of The Square observed OCTAVIA LOGAN holding suspected crack cocaine (on her person) while

⁵⁹The identification of OCTAVIA LOGAN is based on the following: First, law enforcement has identified LOGAN through interviews with LOGAN during a street stop and a seizure from LOGAN. Second, law enforcement has been able to identify LOGAN's voice because LOGAN was intercepted numerous times on **Target Phone One**; LOGAN identified herself or was identified in several calls; and because LOGAN's voice was consistently associated with the same phone number.

talking to other co-conspirators: SHAUN JAMES, LAMONT HARRIS, TERRY COVENS, and WILLIE COVENS some of whom were participating in the sale of narcotics.

234. On or about February 1, 2006, CPD officers attempted to conduct video surveillance inside of The Square. Upon arrival, the CPD officers observed LOGAN yelling to several unknown individuals the presence of the police officers and calling a "ruse officer" by his street name causing everyone that was involved in either buying or selling narcotics to run into the 1836 building. LOGAN ran into the 1846 building to avoid police officers where LOGAN was met by the ruse officers. The Officers confronted LOGAN and seized gold-tinted zip lock bags containing suspect crack cocaine in plain view from LOGAN's right hand. LOGAN told the Officers that she obtained the narcotics from "TIM" (TION NEWTON), and that she was supposed to receive \$20 for selling the crack cocaine.

Title III Calls/Seizures

235. During the course of the investigation, several criminally pertinent calls were intercepted in which LOGAN's role in the conspiracy was established. For example:

a. On or about February 8, 2006, at approximately 10:58 a.m., SHALONDA BROWN, using **Target Phone One**, called LOGAN (call session #7531). BROWN asked LOGAN if "them boys out there deep" (if there are a lot of police in The Square). LOGAN stated that she did not know. BROWN told LOGAN "that's what they just called me and told me so, um, when the coast is clear [the police have left the area], you think you're cool [if LOGAN is thinks it's safe for her to leave her apartment and get or give narcotics to BROWN], then just come to my crib [BROWN's residence]." BROWN also told LOGAN, "I ain't comin' back over there, it's too hot [too many police and not safe for narcotics activities], just come down to my crib, call me when your on your way." LOGAN agreed.

b. On or about March 14, 2006, at approximately 10:48 p.m., MARCUS BROWN, using **Target Phone One**, called LOGAN (call session #14663). BROWN told LOGAN, "Hey lock your door, there's like 9 slickers out here" (there are police in The Square). LOGAN replied, "alright."

c. On or about March 18, 2006, at approximately 10:56 a.m., LOGAN called **Target Phone One** and spoke to MARCUS BROWN (Call session #15372). BROWN asked LOGAN if she could see "JERMAINE" (HARRIS) outside selling narcotics in The Square. LOGAN replied told BROWN that only Individual N and another individual were out in The Square. BROWN told LOGAN that he just gave HARRIS some "rock" (crack cocaine) so that he (HARRIS) could "pop off" (sell the crack cocaine) and that he was supposed to get some "weed" (marijuana) later for LOGAN and BROWN.

WW. DEMOND ROBINSON⁶⁰

Title III Calls/Seizures

236. During the course of the investigation, several criminally pertinent conversations were intercepted in which ROBINSON's role in the conspiracy was established. For example:

a. On or about February 18, 2006, at approximately 5:24 p.m., DEMOND ROBINSON called MARCUS BROWN on **Target One Phone** (call session # 9659). ROBINSON called to ask BROWN if he was "cool on those" (did he have narcotics), to which BROWN replied, "yes." ROBINSON wanted to make sure that BROWN knew what he was talking about and asked, "those billups?" (drug amount). BROWN stated that he had some drugs and ROBINSON told him

⁶⁰The identification of DEMOND ROBINSON is based on the following: First, law enforcement has identified ROBINSON through conversations with ROBINSON. Second, ROBINSON was identified and has identified himself in calls that were intercepted during this investigation; and because that voice was consistently associated with the same phone number.

that he wanted "one" (a quantity of drugs). BROWN asked if he was coming down to the house, and ROBINSON asked if the "shit was weighted already" (packaged and ready to go). BROWN told him that it would only take a second to get it ready.

b. At approximately 5:56 p.m. on the same day, MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session # 9681). BROWN asked ROBINSON if he still wanted what they had talked about (narcotics). ROBINSON told BROWN that a guy had just "come by and grabbed the money" he was going to use to purchase drugs from Brown. BROWN asked him how long it would take for him to get the money, ROBINSON asked BROWN if he was talking about "knock[ing] off the weed" (to sell marijuana). BROWN told him that he was talking about "knocking off a ball" (1/8 ounce of cocaine). ROBINSON told BROWN that it would depend on how long it took to cook it into crack cocaine. BROWN told ROBINSON that it didn't take a week.

c. On or about on March 2, 2006, at approximately 11:46 a.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session #11967). BROWN asked ROBINSON if he had one of "PEPE's" (JOHNEAK JOHNSON) "thumpers" (gun) ROBINSON told him that he did not have one. BROWN told ROBINSON that JOHNSON had said that ROBINSON had a "25" (.25 caliber), and in response, ROBINSON stated that he (JOHNSON) was lying.

d. On or about on March 7, 2006, at approximately 3:21 p.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session #12974). BROWN asked ROBINSON if he had some "boe" (marijuana) and ROBINSON told him that he did not have any marijuana.

e. On or about on March 10, 2006, at approximately 6:02 p.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session #13722). BROWN asked ROBINSON if he had finished selling his supply of narcotics, to which ROBINSON replied that he was not finished yet. BROWN asked ROBINSON how much money he had, and ROBINSON did not reply. ROBINSON then asked BROWN if they were having a meeting back there about something, and he wanted to know what the meeting was about. BROWN told him that there was no meeting but explained that "the motherfuckers going to post up with those thumpers [guns]." BROWN then told ROBINSON that they mentioned his (ROBINSON's) name, and had said that "it was time for you (ROBINSON) to quit playing in your ass, and get back on the grass" (individuals wanted ROBINSON to get out there and start selling drugs again).

f. On or about on March 12, 2006, at approximately 4:02 p.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session #14104). BROWN asked ROBINSON if he had finished selling narcotics and ROBINSON told him that he was not finished yet. ROBINSON asked BROWN how much money he owed BROWN. BROWN told him that it should be \$130, because he had \$10 and six bags of narcotics. ROBINSON reminded BROWN of the \$10.00 that he had given BROWN at the time he was given the drugs. BROWN then stated that ROBINSON owed him \$120. ROBINSON asked BROWN how much he wanted back from the sale of narcotics. BROWN told ROBINSON he wanted a "deuce" (\$200). BROWN told ROBINSON that he would meet with him later. ROBINSON then told BROWN that he moved "that shit (narcotics) because an individual had gotten popped off" (stopped/arrested by police). BROWN asked ROBINSON if he thought the individual who had been stopped or arrested by police would "trick" (cooperate with police), and ROBINSON told BROWN that he was concerned that the police would come back with a search warrant.

g. On or about on March 13, 2006, at approximately 3:22 p.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBINSON (call session # 14360). ROBINSON told BROWN that he never went over there to get the "stuff" (narcotics), but that he was going to get it now. BROWN asked ROBINSON if he thought he would be finished selling drugs that day and ROBINSON asked if he could start his shift at 9:00 a.m. BROWN told him that it did not matter, that he could "move (sell) the shit" (narcotics) whenever he wanted to sell it.

h. On or about on March 14, 2006, at approximately 5:10 p.m., MARCUS BROWN, using **Target Phone One**, called DEMOND ROBERTSON (call session #14604). BROWN asked ROBINSON if he wanted to "fuck with the capsules" (sell capsules with crack cocaine) for a little while. ROBINSON told BROWN to give him a minute. BROWN told him to come by "before somebody else comes." BROWN indicated that they were standing in the back lot waiting for "EARL" (RONALD TURNER). BROWN was going to put ROBINSON on first, but he stated that he could put "RITA" (RITA HEMPHILL) and others on first. BROWN said he could give them six (quantity of some drug). ROBINSON asked if he had some more narcotics, to which BROWN replied that he had "11" (quantity of some narcotic) and that he would be "on" (on rotation, selling narcotics) until the morning. ROBINSON told BROWN to put the others on first, and that he would sell after them.

XX. GARY COVENS⁶¹

Non-Title III Information/Seizures

237. On or about April 15, 2006, CPD surveillance officers observed GARY COVENS yelling out, “caps, caps” (crack cocaine) to pedestrian traffic inside The Square. CPD officers approached COVENS who fled on foot. As the officers chased COVENS, they observed COVENS toss a strip of capsules (each containing a white rock of suspect crack cocaine, totaling of 23 capsules) from his right hand. The officer picked up the suspect crack cocaine and continued to chase COVENS on foot. Eventually, the Officers arrested and interviewed COVENS. The ruse officer questioned COVENS, who stated that “BOO” (RONALD TURNER) had asked him to hold the narcotics for him. Later on in the interview, COVENS changed his story and told the officer that “D” (EARNEST BROWN) had given him the suspect narcotics, not RONALD TURNER.

238. The Officer returned to The Square with GARY COVENS where Individual J, a relative of COVENS, asked what COVENS had done. COVENS said that he ran from the police because did not want to go to jail for something that was not his. Individual J told the Officers although they liked guns, she wanted to know if she could get the Officers some “work” (narcotics) for the release of COVENS. A short time later, subject, Individual K appeared on the scene and provided 20 clear ziplock bags with “batman” logos containing suspect crack cocaine to the Officers, Individual K told the Officers that Individual J had asked her to give the drugs to the Officers. A short time later, Individual J returned to speak to the Officers and asked if they were “cool now” (if

⁶¹The identification of GARY COVENS is based on the following: First, law enforcement has identified COVENS through conversations that they had with COVENS. Second, COVENS was identified and has identified himself by his nickname “BIG MAN” in calls that were intercepted during this investigation and because that voice was consistently associated with the same phone number.

the Officers would let COVENS go). The Officers told Individual J that they wanted “four jabs” (4 bags containing smaller bags or capsules of crack cocaine). Individual J left and returned with 20 additional bags containing suspect crack cocaine.

Title III Calls/Seizures

239. On or about February 4, 2006, at approximately 9:42 p.m., “BRAIN” (TERRY COVENS), using **Target Phone One**, called “BIG MAN” (GARY COVENS) (call session #6810). GARY COVENS can be heard stating in the background, “here guys, I got 6 of them, at this (UI), sell ‘em on this point ” (discussing selling a certain quantity of narcotics in The Square).

240. On or about February 4, 2006, at approximately 9:47 p.m., GARY COVENS, using **Target Phone One**, received an incoming call an Unknown Male (“UM5”) (call session #6811). UM5 asked GARY COVENS if he was “cool” (regarding narcotics). GARY COVENS stated that he was. UM5 asked if “STYLES” (LAVELL COVENS) had come to pick him up. GARY COVENS said “not yet.” UM5 stated that he thought the police had arrested LAVELL COVENS because he was on “19th [street], they ain’t even answering the phones now.” UM5 asked if “they “they (police) got they ass, because he (LAVELL COVENS) say he was on 19th (Street), they ain’t even answering the phones now.” UM5 asked GARY COVENS “so they [police] started chasing you?” GARY COVENS replied, “yeah, I burnt his ass G,” (got away from the police).

241. On or about February 4, 2006, at approximately 9:50 p.m., GARY COVENS, using **Target Phone One**, called UM5 (call session #6814). UM5 asked COVENS “about that ‘jab’ (bag of narcotics containing smaller bags or capsules of narcotics), and if COVENS had narcotics COVENS asked UM5 what he was asking about, and UM5 stated “the lick.” GARY COVENS asked, “what I had on me?” GARY COVENS instructed UM5 to “look at ‘em [the narcotics], go by “REECY”’s (OCTAVIA LOGAN), the last room.” UM5 asked “the last room, where?”

COVENS said by LOGAN and “BRAIN”’s (TERRY COVENS’ s) room. COVENS instructed UM5 to “stay on the phone now, you by the door?” GARY COVENS stated “look up in the crack of the door,” and then asked “you see it?” UM5 said “yeah, right, I got it [narcotics].”

YY. TERRY COVENS⁶²

CI/CW Information

242. In February 2006, the CI informed law enforcement that “BRAIN” (TERRY COVENS) was a “pack worker” who sells narcotics for everyone in The Square.

Non-Title III Calls and Seizures

243. Between October 2004 and January 2006, CPD observed and video recorded TERRY COVENS distributing narcotics in The Square:

a. On or about October 27, 2004, CPD conducted a surveilled and recorded purchase of crack cocaine from TERRY COVENS. A CPD UCO approached COVENS, who directed the UCO to the 1866 S. Karlov building of The Square. Once there, the UCO purchased three blue-tinted ziplock bags, each containing a white rock-like substance. Subsequent analysis of the contents of one of the bags indicated that it contained approximately .1 gram of cocaine base, in the form of crack cocaine.

b. On or about November 26, 2005, CPD conducted video surveillance in The Square. At varies times during the video surveillance, COVENS was observed conducting several narcotics transactions and counting money that was received from the sale of narcotics. Finally, COVENS was observed running into a building in The Square to avoid law enforcement officers.

⁶²The identification of TERRY COVENS is based on the following: First, the CI has identified COVENS as a “pack worker” in The Square. Second, law enforcement have identified COVENS and his voice through conversations with COVENS. Third, COVENS, has identified himself by his nickname “BRAIN” in calls that were intercepted during this investigation.

c. On or about December 29, 2005, CPD conducted video surveillance in The Square. At various times during the video surveillance, COVENS was observed yelling out “blows” (heroin), holding narcotics in his hands, and selling narcotics.

d. On or about January 29, 2006, CPD officers observed COVENS conducting hand-to-hand drug transactions with unknown subjects in the doorway of the 1856 S. Karlov building. CPD officers approached COVENS and conducted a consensual interview with him. During that interview, COVENS admitted that he had been selling “caps” (crack cocaine) for “MOOK” (TREVEL COVENS), but that he had sold all of the narcotics on that particular day.

244. During the course of the investigation, criminally pertinent phone calls were intercepted in which co-conspirators discussed TERRY COVENS’s role in the drug operation in The Square. For instance:

a. On or about February 14, 2006, MARCUS BROWN, using **Target Phone One**, called TERRY COVENS (call session #8974). COVENS identified himself as “BRAIN” and asked BROWN if he had an “eighth” (quantity of crack cocaine). BROWN told COVENS that he didn’t have that quantity right now, but that it would be available in about 15 minutes. COVENS told BROWN that he needed “4 of them” (4 1/8 quantities of crack cocaine).

b. On or about March 16, 2006, at approximately 12:07 p.m., MARCUS BROWN, using **Target Phone One**, called SAMUEL HARRIS (call session #15038). BROWN wanted to know who was selling narcotics in The Square. HARRIS said “BRISCO” (SHAUN JAMES) and “BRAIN” (TERRY COVENS).

ZZ. WILLIE COVENS⁶³

⁶³The identification of WILLIE COVENS is based on the following: First, CW1 and the CI have identified COVENS as a person who sells narcotics in The Square. Second, law enforcement

CI/CW Information

245. In the summer of 2004, CW1 stated that COVENS sold narcotics for TERRELL COVENS, and provided security for the drug operation.

246. In March 2006, the CI stated that COVENS is a "pack worker" in The Square. The CI informed law enforcement that COVENS is always out in The Square selling narcotics. According to the CI, COVENS either sells "caps" (capsules filled with crack cocaine) for TERRELL COVENS or "sawbucks" (\$10 bags of crack cocaine) for LAVELL COVENS, aka "BAY BAY".

Non-Title III Information/Seizures

247. On or about March 4, 2004, CPD executed a search warrant for the 1866 S. Karlov Avenue, Apartment #201 located in The Square. Upon entering the apartment, officers observed WILLIE COVENS inside of the apartment. The Officers saw COVENS drop a knotted bag which contained 12 capsules containing suspect crack cocaine. The Officers subsequently put COVENS under arrest. The Officers recovered one packet containing cannabis and \$115 from COVENS. Officers recovered additional clear capsules containing suspect crack cocaine, packaging material commonly used in packaging narcotics, a small electronic scale, .9mm ammunition, and approximately \$1,146 in United States Currency.

248. On or about January 31, 2006, CPD officers observed WILLIE COVENS in The Square yelling "sawbuck blows" (\$10 bags of heroin) and "dubs, dubs" at unknown pedestrians. Later that day, CPD ruse officers had a consensually recorded conversation with COVENS in which he told the Officers about the "shorties" (younger individuals that sell narcotics in The Square).

have identified COVENS through conversations with COVENS in which COVENS identified himself to law enforcement.

COVENS told the Officers that he didn't know why the "shorties'" were "acting up" (getting into fights and rebelling against management in The Square). COVENS informed the Officers that he had been trying to talk with them so they don't bring any problems such as police presence or rival gang violence to the area.

AAA. PATRICK FRAZIER⁶⁴

249. On or about December 15, 2005, WAYNE BROWN, through PATRICK FRAZIER and ALPHONSO STEWART, distributed 4 ½ ounces of crack cocaine to MARCUS BROWN and ADONIS HOUSE, who in turn distributed the crack cocaine to UCE2. *See* ¶73.

BBB. ALPHONSO STEWART⁶⁵

250. As set forth above, on or about December 15, 2005, PATRICK FRAZIER and ALPHONSO STEWART delivered approximately 4 ½ ounces of crack cocaine from WAYNE BROWN to MARCUS BROWN. MARCUS BROWN distributed the crack cocaine to UCE2 on the same day in a controlled transaction. *See* ¶73.

⁶⁴The identification of PATRICK FRAZIER in this Affidavit is based on the December 15, 2005 traffic stop of PATRICK FRAZIER during which PATRICK FRAZIER identified himself as PATRICK FRAZIER.

⁶⁵The identification of ALPHONSO STEWART in this Affidavit is based on the December 15, 2005 traffic stop of ALPHONSO STEWART during which ALPHONSO STEWART identified himself as ALPHONSO STEWART.

CCC. JEFFREY BOWEN⁶⁶

CI/CW Information

251. In February 2006, the CI informed law enforcement that “BIG JEFF” (JEFFREY BOWEN) sells narcotics for MARCUS BROWN in Indiana. The CI stated that BOWEN usually sells “dime sized” portions of crack cocaine. The CI explained that while BOWEN call sell a piece of “rock cocaine” in Chicago for \$10, he can make up to \$50 on the same amount of crack cocaine in Indiana.

Title III Calls/Seizures

252. On or about December 13, 2005, at approximately 10:06 a.m., MARCUS BROWN, using **Target Phone One**, called BOWEN (call session #1067). BROWN asked BOWEN if he (BOWEN) was still “hustling” (selling drugs) and asked BOWEN how long it would take to sell “20 bags” (20 bags of narcotics). BOWEN told BROWN it would depend on when BOWEN got started.

253. On December 14, 2005, at approximately 11:25 p.m., JEFFREY BOWEN called MARCUS BROWN on **Target Phone One** (call session #1325). BOWEN told BROWN “if you got the shit [drugs], I can go out of town with the shit [drugs] man, I can come back in a couple of days.” BOWEN told BROWN “I’ll go down there like I said, and stay the amount of days it take me [to sell the drugs]. Goddamit, off \$200 worth of shit, I can come back with two stacks [\$2,000],

⁶⁶The identification of JEFFREY BOWEN in this Affidavit is based on the following: First, law enforcement has been able to identify JEFFREY BOWEN’s voice because that voice has been intercepted numerous times, particularly on **Target Phone One**, because JEFFREY BOWEN was identified or identified himself in many of those calls with the same name or alias names (“JEFF”, “BIG JEFF” or “LORD”) and because the voice was consistently associated with the same phone number(s). Second, during particular intercepted calls, JEFFREY BOWEN arranged to personally meet with other co-conspirators and those meetings were surveilled by law enforcement. Third, law enforcement has had conversations with JEFFREY BOWEN during which JEFFREY BOWEN has identified himself as JEFFREY BOWEN.

shit.” BROWN asked BOWEN “if I give you an ounce of cocaine tomorrow . . . what you gonna give me back?” BOWEN told BROWN “off the ounce, let me see . . . I’ll give you goddamit what . . . goddamit, two stacks [\$2,000].” BOWEN went on to say that he and BROWN could split the profits and make “300 off of every eight-ball” (\$300 off of every one-eighth of an ounce of narcotics).

254. On or about February 17, 2006, at approximately 3:29 p.m, MARCUS BROWN, using **Target Phone One**, called JEFFREY BOWEN (call session #9432). BOWEN told BROWN that he only had \$800 left, and explained that he was trying to “get it” (sell drugs) while he could because the “shit” (money) was not going to last forever. BOWEN wanted to ride it out (continue selling drugs). BOWEN told BROWN that the competition in the drug business had “stepped up their game” and was making their “bags” (of narcotics) the same size as his.

255. On or about February 18, 2006, RANDALL BREWSTER, via KENDALL BREWSTER, supplied MARCUS BROWN with crack cocaine, which MARCUS BROWN distributed to JEFFREY BOWEN and OAIS COBBIN in Chicago, Illinois. Law enforcement subsequently seized approximately 27.7 grams of crack cocaine and approximately \$327 from JEFFREY BOWEN and OAIS COBBIN in Chicago. *See* ¶52.

DDD. OAIS COBBIN⁶⁷

256. On or about February 18, 2006, RANDALL BREWSTER, via KENDALL BREWSTER, supplied MARCUS BROWN with crack cocaine, which MARCUS BROWN distributed to JEFFREY BOWEN and OAIS COBBIN in Chicago, Illinois. Law enforcement

⁶⁷The identification of OAIS COBBIN in this Affidavit is based on the February 18, 2006 traffic stop of OAIS COBBIN during which OAIS COBBIN provided law enforcement with an Indiana driver’s license that identified him as OAIS COBBIN.

subsequently seized approximately 27.7 grams of crack cocaine and approximately \$327 from JEFFREY BOWEN and OAIS COBBIN in Chicago. *See* ¶52.

V. PROBABLE CAUSE FOR REQUESTED SEIZURE WARRANTS FOR VEHICLES

257. As set forth in this Affidavit, I believe the facts establish probable cause that the defendants did commit a violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

258. This Affidavit is also made for the limited purpose of establishing probable cause in support of seizure warrants to seize the following vehicles as property constituting or derived from the proceeds the defendants obtained, directly or indirectly, as a result of the violations of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2, and property used or intended to be used in any manner or part to commit or facilitate the commission of said violation:

A. 2003 Chevrolet Monte Carlo – VIN 2G1WX12K839444899 (registered to RONALD TURNER), *see* ¶¶30, 34;

B. 2002 Chevrolet Tahoe Z-71 – VIN 1GNEK13Z62R265916 (registered to TERRELL COVENS and TREVEL COVENS), *see* ¶¶30, 34;

C. 2003 Infiniti – VIN JNKCV51E83M000944 (registered to Individual P), *see* ¶30; and

D. 2006 Chevrolet Equinox – VIN 2CNDL63F566082394 (registered to KENNETH MARSHALL), *see* ¶75.

(hereinafter VEHICLES A-D). As set forth in this Affidavit, there is probable cause to believe that upon conviction of the defendants, VEHICLES A-D will be subject to forfeiture.

259. Based upon my experience, I know that motor vehicles, like VEHICLES A-D are easily transferred or hidden thereby making them difficult to locate. Moreover, I am aware that the

appearance of a motor vehicle can be altered or it can be concealed in a garage or storage area making it difficult, if not impossible, to find for the purpose of forfeiture proceedings. Additionally, motor vehicles can be transported outside the district further increasing the potential unavailability of these motor vehicles for forfeiture in the event of conviction. Finally, I know that unless a motor vehicle is seized, it can be difficult to preserve the value of the motor vehicle for forfeiture purposes, because financial obligations relating to the vehicle, including insurance payments and loan obligations are not satisfied when an owner is given prior notice that his property will likely be subject to forfeiture.

260. In order to ensure that the availability of VEHICLES A-D is preserved for forfeiture, Title 21, United States Code, Section 853(e) authorizes the entry of a restraining order or any other action necessary to preserve the property, and Title 21, United States Code, Section 853(f) states that, in the same manner as provided for a search warrant, a seizure warrant may be issued when the property would, in the event of conviction, be subject to forfeiture and a restraining order may not be sufficient to assure the availability of the property for forfeiture. Additionally, courts have long recognized the unique circumstances involved in searching and seizing vehicles due to their inherent mobility, and the United States Supreme Court has found that the warrantless seizures of motor vehicles do not violate the Fourth Amendment of the United States Constitution where there is probable cause to believe that the automobile is subject to forfeiture, because movable contraband may be spirited away.

261. Based on the above, this affidavit hereby seeks seizure warrants for VEHICLES A-D under § 853(f), because a restraining order or any other action is not sufficient to assure the availability of the VEHICLES A-D for forfeiture.

BROOKLYNN A. RIORDAN
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME
this 8th day of May, 2006

HONORABLE MICHAEL T. MASON
United States Magistrate Judge